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While quantifying the GHG emissions from decisions in the RMP is important, BLM is also required to include qualitative analysis of impacts. A suggested approach for this type of analysis can be found in the section entitled "Risk Assessment" below.

b. Addressing Climate Change Conditions

BLM baseline data on climate change must be sufficient to permit analysis of impacts under NEPA. Importantly, 40 C.F.R. § 1502.15 requires agencies to "describe the environment of the areas to be affected or created by the alternatives under consideration." Establishment of baseline conditions is a requirement of NEPA. In *Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that "without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." The court further held that "[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process."

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There is a growing body of scientific information already available on climate change baseline conditions, much of it generated by or available through federal agencies. Where there is scientific uncertainty, NEPA imposes three mandatory obligations on BLM: (1) a duty to disclose the scientific uncertainty; (2) a duty to complete independent research and gather information if no adequate information exists unless the costs are exorbitant or the means of obtaining the information are not known; and (3) a duty to evaluate the potential, reasonably foreseeable impacts in the absence of relevant information, using a four-step process. Unless the costs are exorbitant or the means of obtaining the information are not known, the agency must gather the information in studies or research. 40 C.F.R. § 1502.22. Courts have upheld these requirements, stating that the detailed environmental analysis must "utiliz[e] public comment and the best available scientific information." *Colorado Environmental Coalition v. Dombeck*, 185 F.3d 1162, 1171-72 (10th Cir. 1999) (citing *Robertson v. Methow Valley Citizens' Council*, 490 U.S. at 350); *Holy Cross Wilderness Fund v. Madigan*, 960 F.2d 1515, 1521-22 (10th Cir. 1992).

As the Supreme Court has explained, while "policymaking in a complex society must account for uncertainty," it is not "sufficient for an agency to merely recite the terms 'substantial uncertainty' as a justification for its actions." *Motor Vehicle Manufacturers Ass'n v. State Farm Mutual Automobile Ins. Co.*, *463 U.S. 29, 52* (1983). Instead, in this context, as in all other aspects of agency decision-making, "[w]hen the facts are uncertain," an agency decision-maker must, in making a decision, "identify the considerations he found persuasive." *Small Refiner Lead Phase-Down Task Force v. EPA*, 705 F.2d 506, 520 (D.C. Cir. 1983), *quoting Ind. Union Dept., AFL-CIO v. Hodgson*, 499 F.2d 467, 476 (D.C. Cir. 1974).

BLM's duty to evaluating reasonably foreseeable significant adverse impacts includes "impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason." 40 CFR 1502.22(b). Such impacts are especially significant in the face of climate change.

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NGO-TWS-13:
See response to NGO-Sierra Club-1.

	NGO-TWS Comments	Responses
NGO-TWS-13 Cont-d.	BLM must provide the public with an explanation of both the data used in analyzing the potential effects of management alternatives and the methods used to conduct the analysis, as well as an opportunity to provide comments and propose corrections or improvements.	
NGO-TWS-14	2. BLM must craft long-term management prescriptions without permanent impairment and unnecessary or undue degradation to the resources in the face of climate change. The Federal Land Policy and Management Act (FLPMA) gives BLM the authority to manage and plan for emerging issues and changing conditions that global climate change will affect in the planning area. FLPMA mandates that when BLM revises land use plans, it must "use and observe the principles of multiple use and sustained yield set forth in this and other applicable law." 43 U.S.C. § 1712(c). The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions. . . a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources. . . and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. 43 U.S.C. § 1702(c). Additional pertinent requirements of FLPMA that specifically apply to land use planning include using "a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; consider[ing] relative scarcity of the values involved; and weigh[ing] long-term benefits to the public against short-term benefits. *Id.* FLPMA provides that BLM must "take any action necessary to prevent unnecessary or undue degradation to managed resources." 43 U.S.C. § 1732(b). These provisions combine to necessitate on-the-ground implementation of climate change policies.	NGO-TWS-14: See response to NGO-Sierra Club-1.
NGO-TWS-15	In addition to the agency's duty to take a hard look at the impacts of climate change to and from the proposed vegetation management plan, BLM must also include a range of alternatives that includes a strategy for mitigating these impacts. CEQ regulations instruct agencies to consider alternatives to their proposed action that will have less of an environmental impact, specifically stating that "[f]ederal agencies shall to the fullest extent possible: . . . Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." 40 C.F.R. § 1500.2(e) (emphasis added); see also, 40 C.F.R. §§ 1502.14, 1502.16. The impacts of climate change should be a major factor in every alternative that is created since it is an undeniable reality that will drive all land use planning decisions.	NGO-TWS-15: See responses to NGO-Sierra Club-1 and NGO-TWS-14.

NGO-TWS	Comments	Responses
NGO-TWS-16	Further, general statements that BLM will conduct monitoring are also not an appropriate form of mitigation. Simply monitoring for expected damage does not actually reduce or alleviate any impacts. Instead, a vigilant science-based monitoring system should be set out in the RMP in order to address unforeseeable shifts to the ecosystem. A detailed monitoring approach is also required under the BLM's planning regulations: > The proposed plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan. The Field Manager shall be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan. 43 C.F.R. § 1610.4-9 (emphasis added). Such vigilant monitoring is absolutely necessary in order to create an effective adaptive management framework in the face of climate change.	NGO-TWS-16: See response to NGO-Sierra Club-1.
NGO-TWS-17	The following is our recommended approach to developing management prescriptions to allow the land and resources to adapt to the impacts of climate change while meeting the agency's legal obligations: ***Recommendations***: The DRMP, in conjunction with the Great Basin Restoration Initiative and the Great Basin LCC, provides BLM with an excellent opportunity to analyze the impacts from climate change to the planning area over the next two decades, as well as the contribution to climate change from management decisions made in the plan. This analysis should in turn lead to the development of thoughtful management prescriptions and alternatives in the land use plan that will address how BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change. The Winnemucca District will especially be informative in broader climate change research efforts and recommendations due to the nature of the landscape and ownership (i.e. mostly federally-owned lands of different gradients and levels of protection). Like other land management agencies, BLM has been struggling to define how it can meet its legal obligations to analyze the baseline conditions and environmental impacts associated with climate change in light of scientific uncertainty and complexity as well how to set management prescriptions that mitigate and adapt to additional or exacerbated stressors caused by a changing climate. In its Fourth Assessment Report, the Intergovernmental Panel on Climate Change reviewed a number of impacts on biodiversity associated with anticipated changes in climate world-wide and concluded, "Overall, climate change has been estimated to be a major driver of biodiversity	NGO-TWS-17: See response to NGO-Sierra Club-1.

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loss in cool conifer forests, savannas, mediterranean-climate systems, tropical forests, in the Arctic tundra, and in coral reefs... In other ecosystems, land-use change may be a stronger driver of biodiversity loss at least in the near term..." but "beyond 2050 climate change is very likely to be the major driver for biodiversity loss globally" (Fischlin et al. 2007, p.241). The IPCC notes further that, "Although links between biodiversity intactness and ecosystem services remain quantitatively uncertain, there is high confidence that the relationship is qualitatively positive" (Parry et al. 2007). Thus, the IPCC has concluded that through its influence on biodiversity, climate change is likely to have direct negative consequences on the provision of ecosystem services. In response, they prescribe "an iterative risk management process that includes both mitigation and adaptation, taking into account actual and avoided climate change damages, co-benefits, sustainability, equity and attitudes." (IPCC 2007) (emphasis added).

Under the pressures of global change, it must be acknowledged that many objects of conservation are at risk wherever they are found, and the traditional natural resource management paradigm of modifying ecosystems to increase yield must change to a new paradigm of managing wildland ecosystems to minimize loss – specifically loss of the ecosystem composition, structure, and function that yields the benefits we seek from wildlands. Natural resource management must change from a paradigm of maximum sustained yield to a paradigm of risk management.

NGO-TWS-18

Although there is no widely-accepted method of assessing and managing risk, we recommend breaking risk down into its component parts—vulnerability, exposure, and uncertainty—as a useful way to think about risk to biodiversity and productive potential. **In the following sections of this document, we recommend an approach for assessing risk in the planning area as well as an approach for management of that risk for BLM to comply with its legal obligations under NEPA and FLPMA as set out above.**

B. BLM Should Adopt the Following Risk Assessment and Management Approach to this Land Use Plan to Comply With Its Legal Obligations

NGO-TWS-19

RISK ASSESSMENT: A RECOMMENDED APPROACH[2]

We strongly recommend that the agency use the following "risk assessment" strategy when evaluating impacts to the planning area under NEPA and relevant guidance.

Efforts to manage risk begin with a risk assessment, which characterizes risk in terms of vulnerability, exposure, and uncertainty, or, as Bartell (1998) has written, an inquiry into "What can go wrong?" and "How likely is it to happen?" To these questions, Bartell adds a third, "So what if it does?" as a gauge to determine if action is needed to address the risk. Bartell's rendering is intended to frame the topic of formal, quantitative risk assessment, but the framework applies to less formal assessment of vulnerability, exposure, and uncertainty, as well.

Assessing Vulnerability

[2] This approach is a truncated version from a larger research paper developed by The Wilderness Society during the scoping period for the Forest planning revision in the Sierra Nevada entitled "Managing the Risk of Climate Change to Wildlands of the Sierra Nevada" (2010).

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NGO-TWS-18 and 19:
The BLM is required to comply with requirements of NEPA. Risk assessment strategies are one way to evaluate impacts. The FEIS/RMP will include other approaches to evaluate impacts and comply with NEPA.

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The vulnerability of ecosystems and the species and physical elements they comprise depends on their inherent qualities and their ability to change or adapt to address new climatic conditions. A system may be considered vulnerable if it is sensitive to the effects of climate change and has limited ability to adjust to those effects. For example, the rocky intertidal ecosystem may be highly sensitive to the effect of rising sea level (and the inundation of the intertidal zone) but less vulnerable if its species are capable of colonizing new habitat created by the rising seas (i.e., high sensitivity, high adaptive capacity). Conversely, a mountain stream community that is dependent on cold summer water from a melting glacier may be very vulnerable once the glacier has melted away, despite the ability of its constituent species to move great distances (i.e., high sensitivity, low adaptive capacity).

Vulnerability of component species can be affected by the tolerance of individual organisms to the direct effects of climate change, the ability of populations to adapt to those conditions through the expression of genetic variability, and the ability to adjust behaviorally to changes in the ecosystem, such as prey shifts. For example, dandelions (*Taraxacum officinale*), which occupy a broad range of climatic conditions despite possessing essentially no genetic variability in the species, would not seem to be inherently sensitive to climate, whereas pikas (*Ochotona princeps*), which live only in the narrow alpine zone of western mountains, may be highly sensitive (Holtcamp 2010). Some species that are able to move easily may be able to adapt well to climate change even if they are inherently sensitive, provided that they can find the conditions they need to live, and others may be able to remain in place, if the population can produce offspring that are adapted to the new conditions. Pollen records indicate that some species have been able to survive dramatic changes in climate in a given place, even though the individuals making up the current population may themselves be quite sensitive. A vulnerability assessment would examine the species and physical elements of existing wildland ecosystems and determine which elements are sensitive, which have the ability to adapt, and what the likely consequences would be of anticipated changes in climate.

Because ecosystems are so complex, it is impossible to evaluate the vulnerabilities of every population, species, community, or other element of the system in question. Instead, risk assessment must focus on particular, high-priority elements or "key vulnerabilities." In its 4th Assessment Report, the IPCC (Schneider et al. 2007) suggested the following criteria for identifying key vulnerabilities:

- magnitude of impacts,
- timing of impacts,
- persistence and irreversibility of impacts,
- likelihood of impacts and vulnerabilities,
- potential for adaptation,
- distributional aspects of impacts and vulnerabilities,
- importance of the system(s) at risk.

In other words, key vulnerabilities are likely to occur where the effects of climate change are large and intense, imminent, long-lasting, highly probable, and likely to limit the distribution of highly valued systems or system elements.

The IPCC uses their criteria to select key vulnerabilities across a broad array of systems: infrastructure, health, markets, agriculture, migration and conflict, as well as biological and

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geophysical systems. Focusing their thinking only on wildland systems, Running and Mills (2009) suggest that the most vulnerable elements of ecosystems are those that are 1) rare; 2) long-lived (with fewer generations in which to evolve); 3) isolated; 4) dependent on special habitats (especially those directly affected by climate, such as deep snow and ephemeral wetlands); and 5) susceptible to the kinds of disturbances likely to result from climate change (fire, floods, extreme drought). In addition to these "highly vulnerable" species, they recommend focusing on a) species with "a high public profile;" b) "data-rich" species; and c) "strongly interacting" species (keystone and dominant species). Species with a high profile are those that are appreciated for their strong contribution to ecosystems services, providing utilitarian, recreational, and aesthetic value. "Data rich" species provide the information necessary to devise potential conservation strategies, and "strongly interacting" species, by definition, control ecosystem function. Running and Mills apply their criteria specifically to species, but similar considerations may apply to features, such as glaciers, rare soils, riparian vegetation, and old growth forests. A vulnerability assessment should explicitly examine species and other ecosystem elements that meet these criteria and explore the factors that make them vulnerable.

NGO-TWS-20

***Recommendation*: The BLM should evaluate the planning area for key vulnerabilities according to the criteria above, and the nature of the climate threat to selected ecosystem elements should be fully examined and presented as part of the plan amendment process in order to comply with its legal obligations under NEPA and other relevant laws and regulations. Such an assessment should include careful consideration of species and habitats of conservation concern.**

Assessing Exposure

The assessment of exposure to climate change requires both the examination of the probability and timing of future climate change and the likely changes to which ecosystem elements may be vulnerable. Changes in average temperature and precipitation are important first-order effects to which many species are sensitive, but there are many other effects that constitute exposure. As mentioned, melting glaciers may cause an increase in summer stream temperature. Increased droughts may stress plants and animals, and early onset of spring is already increasing exposure to fire activity (Westerling et al. 2006). More subtle changes are also expected. Plants may be exposed to pollinator shortages, and species range shifts may turn native species into invasive species. A risk assessment should examine the probability of exposure to these and other likely effects.

Assessing exposure probability involves combining information about likely climate change and its effects. Possible climate change can be assessed using predictive models that can be run under a variety of future scenarios. The results of these climate models can then be linked to other models to explore effects on future vegetation, fire regimes, hydrology, etc. (Lenihan et al. 2006). Where models agree with each other and produce similar results under multiple scenarios, the results can be viewed with a high degree of confidence. Where models produce a range of behaviors, prediction is less robust. In general, as the spatial resolution of models increases through the process of "statistical downscaling," agreement, and hence confidence, decreases. Millar et al. (2007) note, "We might feel confident of broad-scale future environmental changes (such as global mean temperature increases), but we cannot routinely predict even the direction of change at local and regional scales (such as increasing or

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NGO-TWS-20:
See response to NGO-Sierra Club-1.

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decreasing precipitation)." Nevertheless, models can be used to explore possibilities, "game different scenarios, and gain qualitative insight on the range and direction of possible future changes without committing to them as forecasts" (Millar et al. 2007).

In addition to examining the probability of various changes in climate, an assessment of exposure should examine the consequences of those changes and where they are likely to occur in space and time. For example, sea-level rise is a highly likely and potentially devastating consequence of climate change but one that is limited in extent to coastlines. Increased fire activity is also to be expected, but exposure is likely to be of greater concern near homes than away from them. An exposure assessment should examine where the threat of increased fire activity is likely to be most acute, including how that threat will change with growth of the "wildland-urban interface." Potential future effects are many, and precise quantification of probabilities may be beyond the limits of existing tools and budgets. In these cases, future possibilities can be explored through "scenario planning," in which groups of analysts or stakeholders consider a broad range of possible consequences of climate change (Welling 2008).

NGO-TWS-21

***Recommendation*: A risk assessment conducted as part of the plan amendment should identify the direct and indirect modes of exposure to climate change and attempt to quantify them based on the best available science as required by NEPA and other laws and regulations.**

NGO-TWS-21:
See response to NGO-TWS-18 and 19.

Assessing Uncertainty

Because assessing the risks associated with climate change involves predicting future conditions, it is no surprise that it is fraught with uncertainty. Limitations in predictive ability derive not only from uncertainty about future conditions but from limitations of our understanding of current and historical conditions and the factors that drive ecosystem behavior. Table 1 lists only a few of the many sources of uncertainty that plague the assessment of risk from climate change. Each of these sources contributes to risk, and the better they are understood, the more complete the assessment of risk.

The sources in Table 1 are not an exhaustive list but only illustrate the range of unanswered questions. As vulnerabilities and exposure are assessed, many more uncertainties will be revealed. It is critically important that these uncertainties be explicitly documented and incorporated into the risk assessment so that strategies can be developed to reduce uncertainty in the plan.

Table 1. Sources of uncertainty in understanding future climate change and its effects

Data limitations	♦ Poor records of past climate surfaces ♦ Poor records of species occurrences
Limitations in ecological knowledge	♦ Habitat/range models ("climate envelopes") ♦ Limited understanding of species response to climate change ♦ Mortality rates and thresholds of mortality and recruitment ♦ Dispersal ♦ Species interactions ♦ Behavior of novel ecosystems

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	• Effects of interacting stressors
Model limitations and variability	• Limited understanding of the climate system • Intermodel variation in model output • Intramodel variation in model output • Downscaling coarse resolution global output to generate higher resolution future climate (especially in topographically diverse terrain)
Vagaries of human behavior	• Future emissions scenarios • Institutional resources • Public support • Planning horizon • Shifting decision processes and loci

Under such an indeterminate future, assessing vulnerability and exposure will be especially difficult, placing added importance on the identification and reduction of uncertainty in land management plans.

NGO-TWS-22

Recommendation: **Pursuant to NEPA, BLM should identify and document known sources of uncertainty and data needs and initiate action to fill those gaps at the earliest possible point in the RMP amendment process. Where data gaps remain, the plan should include strategies to reduce uncertainties.**

NGO-TWS-22:
See response to NGO-TWS-18 and 19.

MANAGING THE RISK OF CLIMATE CHANGE: A RECOMMENDED APPROACH

We strongly recommend that the agency use the following "risk management" strategy in conjunction with the "risk assessment" strategy laid out above when developing management prescriptions in the face of climate change.

Adaptation is the management of risk to reduce the adverse effects of climate change on ecosystem services received from wildlands. Actions that reduce the vulnerability to, exposure to, and uncertainty of climate change impacts contribute to adaptation. Each of these aspects of risk can be managed to reduce the negative consequences of climate change to wildlands.

Unfortunately, which techniques will be most effective remains to be determined. Learning will require an experimental approach, tailored as appropriate to the specific lands on which they are applied. Silviculture and other intensive management actions will not be appropriate in lands designated to protect wilderness character, but they may be tested on less-restrictive parts of the landscape. The important thing is that these methods are approached

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experimentally, with monitoring to facilitate rapid learning (Lawler et al. 2010). Finally, the diversity of administrative designations present in most landscapes can themselves provide a framework for experimentation that can accelerate discovery of approaches to climate change adaptation.

Reducing vulnerability

Depending on which ecosystem elements are identified as "key vulnerabilities" in the risk assessment, a variety of options are available to decrease vulnerability by reducing the sensitivity to climate change or by enhancing adaptive capacity. One of the simplest and most direct ways to reduce sensitivity is to address the stressors in addition to climate change that make species and ecosystems vulnerable to climate change. Reducing these anthropogenic stressors has been called the "low-hanging fruit" of climate change adaptation (Joyce 2009) and includes increasing the size and number of protected reserves, restoring altered disturbance regimes, halting and repairing the loss and fragmentation of habitat, managing invasive species, cleaning up air and water pollution, and addressing the legacy of past management. According to Galatowitsch et al. (2009), "Key resilience actions include providing buffers for small reserves, expanding reserves that lack adequate environmental heterogeneity, prioritizing protection of likely climate refuges, and managing forests for multi-species and multi-aged stands."

In addition to reducing susceptibility, actions can be taken to enhance the capacity of species and ecosystem elements to remain viable in the face of climate change. Enhancing adaptive capacity consists of actions to facilitate or improve the ability of species (usually) to respond favorably to climate change. The following are several examples of strategies to enhance adaptive capacity derived from the burgeoning literature of "adaptation options" (Noss 2001, Millar et al. 2007, Joyce et al. 2008, Biringer 2003, CNRA 2009, Glick et al. 2009, Running and Mills 2009).

- *Promote connected landscapes.* Restoring and maintaining habitat connectivity provides species with the "room to roam" they need to respond to a changing climate. Without connected habitat, species may not be able to disperse to new locations exhibiting a favorable climate. Providing corridors and habitat connectivity facilitates the innate capacity to disperse in response to climate change.
- *Facilitate migration.* Where movement in response to climate change is blocked by habitat fragmentation or where species lack the dispersal ability to "keep up with" a changing climate, species can be physically moved across barriers. Of course, such decisions must be weighed extremely carefully to avoid the well-known consequences of the arrival of invasive species into novel habitats. McLachlan et al. (2007) offer guidelines for consideration of assisted migration.
- *Provide opportunities for rapid evolution.* The ability of species to adapt to new climates is enhanced where new genotypes are frequently exposed to new conditions. Restoration of disturbance regimes, such as fire, that provide for frequent opportunities for expression of genetic variability can accelerate the process of adaptation.
- *Maintain genetic diversity.* Running and Mills (2009) note, "Contemporary adaptive evolution is facilitated by a medium level of gene flow," suggesting that adaptation may be aided better in the short run by moving genes, rather than species. Maintaining habitat and dispersal connectivity among subpopulations will ensure continued opportunities for interbreeding and cross-pollination and help maintain adaptive capacity in populations. Also, guidelines for replanting following timber harvest

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currently require seedlings to be derived from local seed sources. Expanding the range from which seedlings are derived could help introduce new, better-adapted genotypes into the population.

- *Promote species diversity.* At the community or ecosystem level, adaptation and the maintenance of ecosystem services is well served by maintaining a rich diversity of species. Different species possess different thresholds of response to climate change. The loss of an individual species due to climate change will have a less dramatic effect on an ecosystem if other species are present that can fill at least part of that species' niche.
- *Manage for "asynchrony".* Populations are more vulnerable when all the individuals are in the same demographic stage. The current mountain pine beetle epidemic exemplifies the consequences of a synchronous population, in this case due to the establishment of a single cohort of lodgepole pine throughout the West following widespread mining and fires in the late 19th century. Restoring disturbance regimes can help maintain a heterogeneous landscape with multiple age classes and help reduce vulnerability to climate change.
- *Enhance seed banks and ex situ conservation.* Owing to the unpredictability of the consequences of climate change, it is not too early to consider enhancing and expanding seed banks and other "off site" conservation efforts. Climate change may lead to localized extinctions, especially of isolated populations, and, in these cases, enhancing adaptive capacity will depend on the artificial reintroduction of stock maintained elsewhere.
- *Allow establishment of "neo-native" ecosystems.* The species that exist today have generally been around far longer than the ecosystems they currently compose, often in locales outside of their current range where the climate was historically suitable. As the climate changes, species can be expected to reoccupy their former range where suitable. Also, where species are to be introduced for purposes other than biodiversity conservation (e.g., timber plantations, pastures), review of the paleoecological record may provide insights into where species may thrive in their historically "native" range under an altered climate. Ecosystems so established may be considered "neo-native" in that they would consist of native species in their historical range, though in combinations that may not currently exist.

NGO-TWS-23

***Recommendation*: BLM has a legal duty to prevent permanent impairment and unnecessary or undue degradation to the resources, and to manage the resources for the long-term needs of future generations. This obligation requires the agency to reduce the vulnerability of the ecosystem to the very real threats posed by climate change. BLM can comply with this duty by adopting several or all of the strategies listed above, depending on the ecological composition and land tenure of the area.**

Reducing exposure

As with vulnerability, the climate adaptation literature indicates several options to manage risk by reducing exposure. Most important, but least directly affected by management, is mitigation of greenhouse gas emissions themselves. More under managers' control is the exposure to the effects, both direct and indirect, of climate change. Last, managers can identify and protect those places that are least likely to be affected by climate change, so called "climate refugia."

Responses

NGO-TWS-23:
See response to NGO-Sierra Club-1 relating to climate change. The FEIS/RMP has included management applicable to species diversity—see Vegetation Rangeland and Vegetation Riparian and Wetlands goals. Also note Objectives VR1 and VR3.

Asynchrony-Veg. Forest/Woodland Products addresses asynchrony with a Goal to manage various age classes of trees and diverse understories.

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Mitigation. While the vast majority of emission reduction must be accomplished in the energy sector, there are several actions that wildland managers can take to prevent unnecessary release of greenhouse gases to the atmosphere. One such source of the easiest sources to control is the conversion of old growth to young forest. It is well established that when older forest is harvested and regenerated to younger forest, a net release of carbon dioxide results from the decomposition of coarse and fine debris and soil organic matter that occurs in the warm post-harvest environment (Harmon et al. 1990).

Reducing exposure to the effects of climate change. While it is clear that forest management can affect exposure through its influence on greenhouse gas emissions, it is also clear that climate change has become inevitable, and risk management must focus on reducing exposure to its effects. One of the most likely of these effects is drought, due to more rapid melting of snowpack and increased evapotranspiration – even if precipitation does not change (National Research Council 2008). Increased drought will result in lower levels of summer streamflow and warmer water temperatures, with potentially devastating effects on aquatic ecosystems and impacts on the ability of ecosystems to provide water for human use. In addition to drought, extreme flood events are likely to increase as a result of rain-on-snow events where they have not occurred historically. To address these effects, actions will need to be taken to build up the buffering capacity of watersheds and restore riparian ecosystems degraded by grazing, water diversion, and channeling. The U.S. Climate Change Science Program offers a number of adaptation options for managers of Wild and Scenic Rivers that can be applied as well wherever riparian ecosystems are exposed to the effects of climate change (*See,* Palmer et al. 2008).

Among the emerging strategies to buffer the effects of climate change is to restore the water retaining capacity of river systems. Opperman et al. (2009) argue for actively reconnecting rivers to their floodplains. Similarly, Running and Mills (2009) suggest in some cases it may be helpful to construct "pico-dams" in headwater streams, tiny impoundments intended to retain runoff and maintain late-season flows. Such a strategy may be implemented through the restoration of wet meadows that were drained to facilitate livestock grazing and other uses. In any case, actions such as fish stocking or impoundment should be done to sustain ecosystem integrity and functionality, not simply to enhance sport fishing or manage water supply. Closing and rehabilitating roads can also restore subsurface flow and slow the delivery of runoff to channels.

Climate Refugia. In some cases, it may be possible to avoid exposure to many of the effects of climate change by identifying and protecting those places where climate is unlikely to change. Noss (2001) notes that refugia from past unfavorable climates harbored much of the genetic and species diversity from which extant populations and communities derive and are important objects of conservation for the diversity they still harbor. Similarly, we can expect some places to be less prone to change in the future, and these places will be important to protect for their potential to harbor diversity in the face of regional climate change. For example, Noss cites the case of talus slopes in Iowa that occur in cold-air drainages below ice-filled caves that now support dozens of vascular plant species that are disjunct from boreal forests to the north and west and at least eight landsnail taxa that were previously thought to have gone extinct at the end of the Pleistocene. As downscaled climate models continue to improve, it may be possible to use them to identify places that will be less exposed to climate change and can be protected for their conservation value (Loarie et al. 2009), though much work remains to determine the appropriate size, configuration, etc., for such refugia.

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***Recommendation*: BLM has a legal duty to prevent permanent impairment and unnecessary or undue degradation to the resources, and to manage the resources for the long-term needs of future generations. This obligation requires the agency to reduce exposure of the ecosystem to the very real threats posed by climate change. BLM can comply with this duty by adopting several or all of the options listed above, depending on the ecological composition and land tenure of the area.**

Reducing uncertainty

Uncertainty appears as an obstacle to climate change adaptation in virtually every treatment of the subject; reducing uncertainty may therefore be considered critical to progress in managing risk from climate change. Much uncertainty derives from insufficient knowledge of current conditions and management effects and may be reduced simply through increased emphasis on *monitoring*. Reducing uncertainty about the nature of ecological and social systems and their future behavior requires investment in *research*. Learning can be greatly accelerated by the process of *adaptive management* that combines aspects of both research and monitoring to reduce uncertainty. Where knowledge of the future is especially high and control over the consequences of climate change is low, *scenario planning* may be used to prepare for possible outcomes, thus reducing uncertainty and anxiety over how to respond.

Monitoring. A major impediment to the reduction of uncertainty regarding future impacts of climate change is simply a lack of knowledge of current baseline conditions and the ability to detect change in the future. The U.S. Climate Change Science Program (Kareiva et al. 2008) identifies establishing baseline conditions and monitoring as key elements of impact assessment necessary to support adaptation. In their review of the climate change adaptation literature, Glick et al. (2009) identify increased monitoring as one of five general principles of adaptation. Monitoring is needed not only to detect the effects of climate change but to assess the success of adaptation actions.

Research. Many of the uncertainties associated with climate change can only be addressed through formal research, and research will continue to be essential to climate change adaptation. Accomplishment of much of this research will require cooperation with the agencies managing the land. Reduction of future uncertainty can be greatly accelerated if the managing agencies work closely with scientists to facilitate, advise, and assist in climate change research. If it has not done so already, BLM should invite broad participation from DOI's Landscape Conservation Cooperatives and Regional Science Centers, as well as the Great Basin Restoration Initiative, throughout the DRMP.

Adaptive management. When aspects of monitoring and research are combined into an approach to management that is explicitly intended to accelerate learning, it is called "adaptive management." According to Innes et al. (2009), "adaptive management can be viewed as a systematic process for continually improving management policies and practices by monitoring and then learning from the outcomes of operational programmes. Within the context of climate change,...adaptive forest management is one tool that could enable managers to adjust the structure and the consequent functioning of the forest ecosystem to resist harmful impacts of climate change, and to utilize the opportunities created by climate change." (p.137). Typically,

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Comments

adaptive management follows a continuous cycle of planning, implementation, monitoring and evaluation (DeLuca et al. in press).

Adaptive management is sometimes described as either "passive", when management is modified simply as a result of observing the consequences of past action, or "active", when management actions are designed explicitly as an experiment to test competing hypotheses (Kareiva et al. 2008). Whatever the case, monitoring is essential to the process of evaluation and modification. Experience has also shown that adaptive management functions best when it involves the public in the identification of the hypotheses to be tested, in the design of the monitoring strategy, and in the implementation of the monitoring program (Bliss et al. 2001, Innes et al 2009). So important is stakeholder involvement to the development of the "social license" necessary for management action that "the entire concept has been renamed adaptive collaborative management or adaptive co-management" (Innes et al. 2009). In the end, BLM must apply the lessons learned from monitoring and research to amend their decision path as necessary.

Scenario planning. When uncertainty is high and the "controllability" of the outcome is low, there may be little that managers can do to design management strategies "to resist harmful impacts of climate change" as referred to above (Innes et al. 2009). In these cases, uncertainty, or at least anxiety over the uncertainty of climate change, can be reduced by scenario planning. Scenario planning is (usually) a qualitative process "that involves exploration and articulation of a wide set of possible or alternative futures" (Baron et al. 2008). Scenarios are plausible stories or narratives describing what might happen under an uncertain future. Their development can be aided by quantitative data or models, but the idea is to explore a range of possible futures, rather than try to predict a single "most likely" case. When developed in the context of broad stakeholder participation, they can increase understanding of key uncertainties, facilitate the incorporation of alternative perspectives into planning, and improve the capacity for adaptive management (Welling 2008).

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***Recommendation*: Reducing uncertainty of baseline conditions and the impacts of management in the face of climate change should be a major priority of any risk management strategy set forth by the agency to reduce the risk posed by climate change. BLM should build in robust research, monitoring, adaptive management, and scenario planning into the land use plan in order to address this challenging aspect of risk management.**

Thank you for considering these comments. Please contact us with any questions.

Sincerely,

The Wilderness Society
Nada Culver, Senior Counsel and BLM Action Center Director
Juli Slivka, BLM Action Center Outreach Coordinator

Attachments

1. Sensitivity Based Prioritization for Development Areas Within Renewable Energy Zones
2. Little Snake Proposed RMP Appendix F

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Responses

NGO-TWS-24:
See response to NGO-Sierra Club-1 with respect to climate change. BLM has included adaptive management and monitoring in the FEIS/ RMP.

Attachment documents were reviewed and considered by BLM; however, it is not included in this Appendix. To view this document contact the Winnemucca District Office at 775-623-1500, or via e-mail at wfoweb@blm.gov.

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Comments

Responses

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NGO-Unknown

Comments

Deniz Bolbol
<deniz_b@yahoo.com>
10/22/2010 12:12 AM
Please respond to deniz_b@yahoo.com

To wdrmp@blm.gov
cc
bcc
Subject Winnemucca RMP, Edwards

Dear Winnemucca District Office,

NGO-Unknown-1 | Please accept this letter as official comments on the draft Winnemucca Resource Management Plan (RMP).

None of the alternatives described in the Winnemucca RMP adequately protect and preserve wild horses and burros.

The policies presented do not change the BLM's reliance on mass wild horse roundups and removals every few years to maintain population numbers. This fiscally irresponsible and cruel policy has resulted in the stockpiling of more wild horses (~40,000) in government holding facilities than are left free on the range (<33,000) and costs taxpayers tens of millions of dollars annually.

NGO-Unknown-2 | This RMP must set a policy that breaks the unsustainable cycle of roundups and removals in favor of managing horses on the range in a humane and cost-effective manner. This policy must include:

-3 | -4 | -5 | -6 | -7 | -8 | -9 |

- Reducing or eliminating livestock grazing within designated wild horse and burro areas;
- Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity.
- Fairly allocating forage and water resources for wild horses and burros within designated herd management areas.
- Increasing Appropriate Management Levels for wild horses and burros.
- Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species.
- Protecting predators in an effort to restore natural population control mechanisms.
- Utilizing PZP fertility control, where necessary, to control wild horse reproduction.
- Supporting public/private partnerships for the creation of wild horse preserves and to implement alternative management strategies aimed at maintaining horses on the range and avoiding roundups and removals.

-10 | Roundups should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds; family bands should be relocated intact.

-11 | The zeroing out of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited. In addition, already zeroed out Herd Areas should be re-evaluated for potential re-introduction of wild horses and burros.
Over the last four decades, BLM has removed 20 million acres of wild horse habitat. This trend must be reversed.

I urge you to incorporate these important principles into the Preferred Alternative designated in the RMP.

Thank you for your consideration.

Deniz Bolbol
box 5656
redwood city, CA 94063

Responses

The BLM received approximately 499 form letters listing comments identified in NGO-Unknown. The BLM therefore considers the responses to this form letter as applicable to all form letters received listing the same comments. It should be noted the form generated by the Unknown group allowed submitters to add additional comments. Added comments on the form ranged from concern over the ranching/mining industry and development, concern over how horses are treated during gathering operations, the desire to protect horses and burros as part of our national treasure, to be kind to the wild horses, and to leave them alone. Many of the added comments were in disagreement with the BLM and its Wild Horse and Burro program and the use of tax dollars to gather the animals.

The BLM manages public lands for multiple uses, one of which is for wild horses and burros (WH&B). The appropriate management levels (AMLs) for wild horse and burros were set in conjunction with the animal unit months (AUMs) for livestock grazing and wildlife. The appropriate management levels were set to achieve a thriving natural ecological balance on the public lands.

The BLM complies with the Wild Free-Roaming Horses and Burros Act of 1971 and uses the most humane tools during gathering; 43 CFR, Part 4740.1, states that "motor vehicles and aircraft may be used by the authorized officer in all phases of the administration of the Act, except that no motor vehicle or aircraft, other than helicopter, shall be used for the purpose of herding or chasing wild horses or burros for capture or destruction. All such use shall be conducted in a humane manner."

NGO-Unknown-1: See above. BLM is mandated to manage WH&B in accordance with the Wild Free-Roaming Horses and Burros Act of 1971.

NGO-Unknown-2: There are no designated wild horse and burros areas. HMAs are areas where burros and wild horses were found in 1971 that we manage for horses but not exclusively. Alternative C-LG 1—option 2 proposes elimination of livestock grazing throughout the WD.

NGO-Unknown-3: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing. The BLM has revisited he WH&B management actions and environmental analysis in the FEIS/RMP.

NGO-Unknown

Comments

Responses

NGO-Unknown-4: The amount of forage available to allocate to WH&B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. Forage for WH&B (AUMs) is allocated based on the AML upper limit.

NGO-Unknown-5: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

NGO-Unknown-6: This is achieved by maintaining herds at AML and through properly managed livestock grazing.

NGO-Unknown-7: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis . See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.

NGO-Unknown-8: Alternatives A, B, and D allow use of birth control methods for WH&B including PZP.

NGO-Unknown-9: Comment noted.

NGO-Unknown-10 and 11: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

NGO-WWP-Fite

Comments

September 24, 2010

Mr. Robert Edwards
Ms. Lisa Ross
Winnemucca BLM
5100 East Winnemucca Blvd.
Winnemucca, NV 89445

RE: Winnemucca RMP DEIS

Dear BLM,

Here are comments by Western Watersheds Project on the Winnemucca RMP effort. We have modified some of our earlier comments, and added to them.

The Analysis of the Management Situation on which this DEIS is largely based is:

NGO-WWP-Fite-1

1) Outdated. Most info is from 2005-2007 or earlier.

NGO-WWP-Fite-2

2) Extremely limited in its consideration of current ecological science related to many important elements. This includes microbiotic crusts, current ecological condition of plant communities and habitats, invasive species presence and risk, adverse effects of chronic livestock grazing disturbance, climate change issues and effects.

NGO-WWP-Fite-3

3) Lacks Sufficient Baseline information to base a valid RMP effort and alternatives on. The AMS (and limited "new" info used in the RMP) fail to provide an adequate Baseline of many components of the environment. This current Baseline info is essential for the RMP to be a current inventory of the public lands, as required under FLPMA. For example, there is no systematic current Ecological Site Inventory so that a full understanding of the basis for any claims of current or future sustainability or allocations for grazing or other uses can be based. The last ESI was likely 20 or more years ago.

4) Provides a greatly inadequate cumulative effects analysis of all the many often overlapping demands and impacts to air, soils, microbiotic crusts, waters, watersheds habitats, rare, imperiled and ESA species and population viability, human uses and enjoyment, visual settings, climate change andother aspects of the environment.

NGO-WWP-Fite-4

There is no systematic Baseline inventory for a wide array of rare and declining native biota – sensitive species, and federal candidate species in particular. There is no analysis of the current status of animal and plant populations (like Sage Grouse, Pygmy Rabbit, Loggerhead Shrike, Yellow-Breasted Chat, Pinyon Jay, Ferruginous Hawk), or their viability over the short, mid and long term.

NGO-WWP-Fite-5

These deficiencies remain uncorrected in the DEIS. Much more current and adequate information must be collected. As it stands, the EIS continues the Manifest Destiny/Endless Frontier mindset – that there are endless acres of public land that can continue to be sacrificed to all manner of intrusive or economic uses. The RMP focuses primarily on short-term economic gain for a hand full of interests – like ranching and mining - at the expense of other values of the public lands. It fails to adequately recognize that many uses are no longer able to occur especially at such high levels and in so many

1

Responses

NGO-WWP-Fite-1: BLM considers information provided in the AMS as relevant. The AMS described current management, trends and forecasts by resource. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. The FEIS/RMP has been updated to reflect current data and additional information.

NGO-WWP-Fite-2: See response to NGO-WWP-Fite-1.

NGO-WWP-Fite-3: The BLM analyzed existing inventory data and other information in the development of the AMS. The AMS considered indicators, current conditions, trends, forecast, and key features. Existing data was utilized to support these sections. There are no cumulative effects analyses in the AMS. The DEIS analyzed cumulative impacts based on a range of reasonable alternatives. However, the FEIS/RMP has been prepared with revisions to the cumulative impacts sections.

The BLM has prepared a DEIS that analyzes four alternatives with one alternative having a "no grazing" option. (Option 2).

NGO-WWP-Fite-4: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. In the Affected Environment, the DEIS described information related to key special status species for management which included: Pygmy Rabbit (p. 3-58), Sage-Grouse (p. 3-58 & 3-59), Western-Yellow-Billed Cuckoo (p. 3-59), Columbia Spotted Frog (p. 3-59), Yellow-Breasted Chat (3-59), and Ferruginous Hawk (p. 3-52). Management actions to protect healthy habitat for sensitive species and to provide mitigation measures to reduce impacts are included in Objective SSS 1, and management actions SSS 1.1 and 1.3. Alternatives were developed using existing available data, input from the Sierra Front-Northwest Great Basin RAC Subgroup, Cooperating Agencies, and from issues identified through public scoping.

NGO-WWP-Fite-5: The FEIS/RMP has been updated to reflect current data and additional information.

NGO-WWP-Fite

Comments

areas – if there is to be anything remaining for wildlife and other native biota, and water and watersheds, on the public lands.

An RMP written in 2010 must fully reckon with the **limits** to "resource" exploitation, and the increasingly non-renewable toll that grazing and other chronic disturbances impose on native ecosystems. The days of Manifest Destiny are over.

Adequate Current Inventory Lacking

The DEIS fails to provide a current inventory of the public lands based on current ecological science. It fails to base analysis and decisionmaking in many areas such as grazing on current ecological science – instead is buried in the worst of the Nevada Ag. Extension livestock industry range myths – forsaking current ecological science.

Many provisions of the RMP Alternatives provide overwhelming emphasis on economic interests at the expense of all other values of the public lands. Many provisions embraced by the RMP will result in further extirpations and extinction of native biota or animals that the public values. BLM sweeps under the rug the severe ongoing effects of livestock grazing, and the calamitous effects of the severe habitat loss, fragmentation and degradation that has occurred/is occurring.

Issue Identification Concerns

The EIS Issue identification has not provided sufficient info and analysis to allow understanding of: the scientific framework, or analysis, used in defining any threshold; how substantial change is defined; what level of controversy is acceptable; and provide that sound and prudent management of resources is required despite high degrees of controversy. What exactly is meant be a "wide range of opportunities", or that would cause disagreement over impacts? Under this kind of RMP development system/management paradigm – it appears that if ranchers object to changes in grazing, or for example disagree about scientifically proven domestic sheep transmission of diseases to bighorn sheep, issues might not be included. Or BLM will just perpetuate the status quo and allow domestic sheep to inundate potential bighorn habitat. Is this correct?

BLM cannot rely on a 2005 Scoping Report/AMS to address issues in 2010. For example, the issue of livestock-facilitated desertification and weed invasions feeding into climate change and exacerbated by it as well - were not as well known in 2005. The processes by which this feeds into and amplifies adverse climate change effects, now are. See Steinfeld et al. (2006).

This information should be a driving force in all of a reasonable range of alternatives, and alternatives should strive to buffer adverse impacts of climate change by removing and reducing environmental stressors such as grazing or energy disturbance. Instead, we see an EIS that has several alternatives that ignore current science.

Purpose and Need

ES-3 states that this is being prepared to provide new info and data. In order to fulfill this, current ecological science on all facets of the environment, and an integrated consideration of the dire 2010 straits of important sagebrush, salt desert shrub and other habitats due to the adverse effects of the

NGO-WWP-Fite-5 Cont-d

NGO-WWP-Fite-6

NGO-WWP-Fite-7

NGO-WWP-Fite-8

NGO-WWP-Fite-9

Responses

NGO-WWP-Fite-6: BLM has complied with the CEQ Regulations 40 CFR §1500.4 (d) and §1507. Through RMP scoping relevant issues were identified and they remain relevant.

NGO-WWP-Fite-7: BLM has complied with 43 CFR 1610.4-1 issue identification and Council of Environmental Quality Regulations 40 CFR §1500.4 (d) and §1507. Through RMP scoping relevant issues were identified and they remain relevant. Although a number of years have passed since initial scoping of the RMP, BLM has determined that the planning issues identified remain relevant. The Draft RMP/EIS (DEIS) has been updated to address changes in laws, regulations and policy that have occurred since initial scoping. Based on public comments received on the DEIS, any new emerging issues would be addressed in the Final RMP/EIS.

NGO-WWP-Fite-8: The Scoping report and AMS remain relevant. Management actions related to livestock grazing and weeds were included in the DEIS. Climate change has been revisited in the FEIS/RMP.

NGO-WWP-Fite-9: The range of alternatives were developed to address relevant scoping issues and included working with the the Sierra Front Northwestern Great Basin Resource Advisory Council subgroup.

Section 1.2 describes the Purpose and Need of the PRMP. Proposed management of rangeland vegetation is located in Table 2-1 Vegetation Rangeland Section. Specifics concerning management of Sagebrush and Salt Desert Scrub are located in Table 2-1 at VR 6, VR 7, VR 8.

NGO-WWP-Fite

Comments

many heavy disturbances BLM has been imposing, and seeks to continue to impose, is critical. BLM must determine how dire the situation is to develop a proper RMP. BLM must also provide detailed analysis of the status of lands at the time of the previous MFPs – and compare that to the present situation. This is the only way to understand the trajectory of No Action, or the very similar components of many sections of alternatives, including the preferred Alternative. It is essential to understand too if BLM is complying with its Conservation planning and promises made to the public.

While this section mentions new management direction, it is very vague, and it is unclear what if any this direction is, and how science - or finite limits to resources – such as sagebrush or salt desert shrub communities lacking cheatgrass - affects that direction. Is it really suitable to continue imposing any chronic grazing disturbance on such lands? Or to permit new mining, geothermal, wind or other development in lands that remain in intact condition?

NGO-WWP-Fite-10

And of course, as part of this process, BLM must conduct a current ESI or equivalent "hard scientific look" at such lands, and identify protections, and conduct current carrying capacity, capability and suitability analyses.

The P&N section provides no real basis for developing a reasonable range of alternatives.

NGO-WWP-Fite-11

We understand that the RMP alternative structure was developed by "consensus" of the RAC. This process cuts out a very large number of the American public – including Scoping commentors like WWP, large wildlife advocacy groups, wild horse groups, and others. Just because someone does not live near Winnemucca and is on the RAC does not mean their concerns can be marginalized, while a "consensus" process on a BLM RAC occurs. We also note that the RACS themselves are politicized The state Governor has to sign off on any one appointed. We have seen cases in Idaho where Ph.D internationally recognized experts have been booted off the RAC – because their views clashed with those of a reactionary Governor.

We also understand that a Manager a couple years ago or more (Mr. Givens) picked and chose what he wanted to put into the Preferred Alternative.

This alternatives development and issues process must be redone fully and fairly in a Supplemental EIS.

Management Alternatives

The EIS states that alternatives must provide a mix. Agencies often mis-interpret this and develop alternatives that are very mixed/blended just so the agency can say there is a mix, and alternatives often include "poison pills". Or they are made to be just enough "different' for the sake of having some kind of a range – that they do not provide a comprehensive and coherent framework for managing public lands based on current science and needs.

NGO-WWP-Fite-12

This section also mentions development – but says nothing about removing existing developments. Why must BLM always INCREASE development? Some of the Winnemucca lands are already developed to death. We stress that a full inventory of the Footprint of mines, grazing facilities, energy projects, communication facilities, roading etc. is NOT provided in the DEIS. Without a current Baseline, and overlay of all of these impacts – how can valid EIS process occur?

3

Responses

A range of alternatives were provided for management of sagebrush and salt desert shrub - See VR6 and VR8.

BLM through FLPMA is mandated to manage public lands for multiple uses some of which cause disturbance.

NGO-WWP-Fite-10: The BLM has prepared a DEIS that analyzes four alternatives with one alternative having a "no grazing" option. Option 2).

NGO-WWP-Fite-11: Although the alternatives were developed in collaboration with the RAC subgroup, public outreach has been extensive and contributed to development of the planning issues and RMP alternatives. Nine RAC meetings were held, nine cooperative agencies have signed onto participate in the planning process. Over 1600 individuals and organizations were sent RMP newsletters. Newspaper advertisements and news releases were published. In addition four public open houses were held during the scoping process and for the DEIS. Tribal governments were notified and Native American consultation was included. Two socio-economic meetings were held. BLM staff were given input into the process to ensure consistency with applicable, laws, regulations, and policy. A Notice of Intent and Notice of Availability were published in the Federal Register on March 25, 2005 and June 25, 2010, respectively.

The alternatives were developed based on the Analysis of Management Situation, purpose and need, issue identification, and comments received from public scoping. Cooperating agencies, Tribal governments and the RAC subgroup also assisted with this process.

NGO-WWP-Fite-12: BLM is mandated by FLPMA Sec. 102(7) to manage public lands based on multiple use and sustained yield. FLPMA Sec. 202 (c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

Alternative C emphasizes management strategies to preserve and protect ecosystem health. A range of alternatives addressing removal of range improvements are found under Livestock Grazing section LG 5.1 and WH&B management WHB 2.2 Alternatives C & D.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-13

BLM must develop a series of alternatives that focus on lessening the harmful impact of economic and other uses, rather than maintaining largely the status quo, even increasing disturbances, or clouding future management with loose and highly uncertain adaptive schemes that lack specifics, sideboards, and definite triggers for action.

The Winnemucca landscape has become increasingly industrialized, developed and fragmented under the MFPs. Vast areas are now seas of cheatgrass and weeds. Ground and surface waters are declining –due to mine and other aquifer drawdown including irrigation diversions and pumping in some areas, and from BLM water developments (spring developments, ponds dug into drainages and springs, and other disruptions of natural hydrology) and livestock wells on public lands. Fences and other facilities as well as livestock salting/supplement feeding have helped spawn networks of roading. Large areas have been adversely affected by mining explo and development. With increased temperatures, altered precipitation regimes including more rapid and earlier runoff due to earlier snowmelt, and likely increased wildfires as lands dry out earlier and weed proliferation continues especially under chronic grazing disturbance, and other adverse effects predicted as a result of climate change, all of these problems are only going to worsen over the life of the RMP Plan that BLM is developing.

NGO-WWP-Fite-14

So in order to ameliorate and lessen the effects of climate change, rampant ongoing desertification caused by livestock and other disturbances, mine and other aquifer drawdown and demands on scarce waters, a much more protective and concrete management actions must be provided under a greatly revised range of alternatives in a SEIS.

Alternatives for a reasonable 2010 EIS that can grapple with these large-scale ecological concerns and prevent further ecological collapse must emphasize:

NGO-WWP-Fite-15

* Protection of remaining intact lands - Keeping what remains in some semblance of native condition Whole. This must occur across checkerboard or other lands, too. BLM must strive to maintain and acquire lands to protect remaining better condition less weedy vegetation communities and habitats.
* Taking actions to lessen the disturbance Footprint of grazing, roading and other human effects in relatively intact lands. This includes both active and passive restoration.
* Conducting real ecological restoration on degraded lands within or near blocks of remaining better condition lands. In RMP Scoping comments, we provided information on alternatives for restoring native ecosystems. Sadly, this like much of the other public comment submitted during Scoping appears to have disappeared as the local RAC hashed out a "consensus" plan that makes few changes to the status quo in grazing and many other areas.

A science-based approach was summed up in ICBEMP analysis for western arid lands communities years ago. Wisdom et al. (2002) ICBEMP recommendations for sagebrush habitats were:

1) **Conserve** native grasslands and shrublands that have not undergone large-scale reduction in composition of native plants;
2) **Control** or eradicate exotic plants on native grasslands or shrublands where invasion potential or spread of exotics is highest;
3) **Restore** native plant communities where potential for restoration is highest.

4

Responses

NGO-WWP-Fite-13: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data. The FEIS/RMP has been updated to reflect current data and additional information.

NGO-WWP-Fite-14: BLM has developed a reasonable range of alternatives, Alternative C emphasizes protection of the environment.

NGO-WWP-Fite-15: Many actions incorporate use of existing disturbed areas to reduce or lessen new disturbance footprints. See Appendix B – SOPs, BMPs – Also re-use is proposed under SD section.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-16

Winnemucca BLM must employ the full set of information from the suppressed Great Basin Ecoregional Analysis and the Nevada Ecoregional Analysis conduced by Wisdom, Suring, Rowland and others circa 2005-2006, and update it employing full assessment of adverse livestock and facility impacts to the work in these analyses. These analyses painted such a bleak picture that BLM/USDI would not publish the reports – instead the authors of the chapters had to publish the information independently.

NGO-WWP-Fite-17

Info in these Analyses must be updated using current ecological science on adverse impacts of livestock grazing to arid land systems, expected adverse impacts of climate change, and information in the Knick and Connelly 2010 Sage Grouse Monograph chapters - found on the USGS Website.

This all is necessary to comply with BLM's Conservation Plan requirements for candidate Sage Grouse and other species.

NGO-WWP-Fite-18

Active ecological restoration actions include removal of crested wheatgrass, forage kochia and other exotic seedings and replanting with native species, efforts to restore cheatgrass infested areas, fence and facility reduction and removal - along with closures of roading paralleling fences and other facilities, water project removal and restoration of natural flows where possible, road closures, and retention and recovery of large blocks of less trammeled lands – to aid in buffering lands from climate change effects, and to ensure sustainability of resources (water, native vegetation, wildlife habitats and populations).

Passive restoration involves concrete measures to minimize disturbances so that native vegetation community components including microbiotic crusts and natural watershed processes can be maintained and recovered. It emphasizes managing for **the natural resilience** of these communities – not artificial manipulation and interference with natural recovery processes.

This should be accompanied by emphasis on placing lands "off-limits" to energy and other development, and management for inter-connected functioning ecosystems able to sustain healthy and viable populations of Sage Grouse, Pygmy Rabbit and other rare species, as well as landscapes that naturally buffer climate change effects and act to naturally absorb CO2 and other climate change gases. In looking at the various maps of more "special" habitats – it is vividly clear that no movement corridors or landscape connectivity is provided. BLM somehow seems to think that small islands will somehow suffice to provide for viable populations of increasingly rare biota. See for example, Map Vol. 5, 2-7. We understand that there are naturally interspersed vegetation/plant community patterns – but striving to maintain large connected blocks of habitat is critical if BLM wishes to have viable, rather than collapsing and ultimately extirpated populations.

NGO-WWP-Fite-19

Alternative A is the Baseline for Management. But what and where is the FLPMA-required current inventory Environmental Baseline under this Alternative, and that should serve as the basis for comparing with the other alternatives? It is lacking in nearly all components and resource analyses.

NGO-WWP-Fite-20

How have conditions changed under the management of Alternative A since the old MFP was adopted? For example, if livestock stocking was 399,073 AUMs in the 1980s (days of the old MFP and Grazing EIS's), and many adverse ecological changes have occurred under grazing at that level, how can that info be used to inform development of what really is a "reasonable" range of science-based alternatives? We are faced with the **absurdity of BLM proposing Alt A – 399,703 AUMs, Alt. B-**

5

Responses

NGO-WWP-Fite-16: Impacts from livestock grazing were addressed in Chapter 4.

NGO-WWP-Fite-17: The BLM has conducted additional analysis for climate change in the FEIS. This analysis includes greenhouse gases, major economic sectors contributing to emissions that are subject to BLM land use management practices, global mean temperature changes and future trends.

NGO-WWP-Fite-18: BLM is mandated by FLPMA Sec. 107(7) (8) to manage public lands on the basis of multiple use and sustained yield while protecting and preserving the environmental quality of public lands. Many actions related to restoration, minimizing disturbance, and maintaining large connected blocks of habitat were included in the DEIS and have been revisited in the Final RMP/FEIS.

NGO-WWP-Fite-19: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Analysis of the Management Situation (April 2005) discloses conditions and current management conditions since the adoption of the MFPs. Alternative A was developed using existing available data.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-20: The AMS identifies how issues and conditions have changed. The old MFPs did not adequately address a number of issues including but not limited to: OHV travel management, mine reclamation, and ACECs. Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-20 Cont-d

399,073 AUMs, Alt C-LG -399,073 AUMs, At C-LG No grazing, Alt. D-LG – 398, 860 AUMs being allocated under this RMP.

We are also mystified about why in the series of deficient RMPs that WWP has challenged and in the Jarbidge process, we were told that the RMPs didn't "allocate" AUMs. Yet here precisely that is occurring.

NGO-WWP-Fite-21

Alternative B "emphasizes resource use". But there is not sufficient baseline data, or full and fair consideration of current ecological science, to determine what level, if any, of "use" that the particular resource can withstand/tolerate without new and expanded irreparable or irreversible losses occurring. If a particular resource is in dire straits, or facing chronic disturbance impacts whose adverse effects are amplified by climate change, it is quite likely that only minimal levels of use coupled with removing some stressors, could in any way, shape, or form be considered sustainable, or could result in BLM complying with its conservation plans for Sage Grouse and other rare species.

NGO-WWP-Fite-22

What baseline data and assumptions were used in formulating this and all other alternatives? How were changing climate effects, weed invasion and expanding dominance risks following disturbance – including from livestock grazing and other uses, levels of desertification and depletion, loss or reduction in surface water flows, impacts of existing mining (such as ground water depletion), status of already degraded and fragmented habitat and declining populations of rare and imperiled biota, the public's increased use of Open Space, and other factors outlined, analyzed qualitatively and quantitatively, and incorporated into the RMP alternatives and their development?

NGO-WWP-Fite-23

The whole Fire Regime Condition Class scheme is largely irrelevant to really managing public lands in the arid Great Basin. It has little to nothing to do with arid lands habitat –except in use in promoting reductions an fragmentation in habitat, and further losses and fragmentation for important, sensitive and rare species that typically rely on mature and old growth communities that projects applying the FRCC tend to reduce or destroy.

FRCC was derived largely for mid to high elevation forested communities in the Northwest and Northern Rockies, which are largely absent in the district. It appears to be being used in current BLM Land Use Plans primarily as a mechanism for getting fire funds.

Instead, **we suggest a foundation of all alternatives should be ways to maximize retention of native vegetation communities, microbiotic crusts, and large intact blocks of habitat with minimal weeds - especially old growth and mature communities.** Managing for intact microbiotic crusts also helps to prevent the spread of invasive species.

FRCC is also aimed at killing, reducing and removing the very species sagebrush and trees that are the anchor plants for preventing weed expansions. This is often done in highly invasive ways –maximizing likelihood of cheatgrass and other weed invasions.

We are greatly concerned at the large area where BLM proposes fire for "resource benefit" under this Alt. There is great danger that any fire in the few higher elevation areas "sky island" type lands could move into sensitive communities. Especially since these areas are largely mountain tops – a fire could quickly spread.

6

Responses

NGO-WWP-Fite-21: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-WWP-Fite-22:BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-23: BLM complies with the Healthy Forest Restoration Act of 2003. BLM uses FRCC as one tool with respect to fuels management. BLM collaborates with federal, state and tribal agencies in an effort to construct strategically placed fuelbreaks in an effort to protect wildland urban interface areas, and thousands of acres of critical wildlife habitat, including habitat for LCT, Sage-grouse, pygmy rabbit, and provide for public and fire fighter safety. The fuelbreaks are intended to stop or slow the spread of wildfires. In many instances fuelbreaks are constructed using mosaic patters keeping portions of the shrub component in place. BLM strives to use existing disturbed areas for placement of fuelbreaks. BLM combines habitat restoration with many of these fuels projects. Section VR4 provides a range of alternatives that include improving conditions classes of vegetation from Class 3, high departure to Class 2 to moderate departure. In addition fuelbreaks are maintained and monitored to ensure they remain effective to change fire behavior.

NGO-WWP-Fite

Comments

In addition, there is a tremendous effort being made in Nevada to destroy critically important pinyon-juniper communities and old and mature sagebrush communities as well through mowing that spawns cheatgrass. This was the basis of much of the Ely RMP – where 2/3 or more of the vegetation communities are proposed to be reduced, altered, or manipulated – with a likely outcome of extirpation or extinction of dependent species from large areas. Large-scale habitat destruction and loss is occurring in old and mature sagebrush communities, as well as in sites that are historically pinyon juniper communities. In their place, BLM is getting weeds, cheatgrass and bare dirt and some scraggly bunchgrass. Sadly, Winnemucca BLM may be ore-determining the outcome of this RMP by undertaking just such weed-spawning projects in the Montana Mountains and other areas. These destructive projects increase fire risk through promoting flammable weeds.

NGO-WWP-Fite-24

At any rate, BLM must examine the cumulative effects to habitats from Ely, Battle Mountain and other BLM and Forest actions that reduce, alter and fragment habitats.

NGO-WWP-Fite-25

We strongly support recognition of the Stillwater Forest values, but ask that BLM identify and expand this protection to other forested areas.

NGO-WWP-Fite-26

This is also part of the cumulative effects analysis that BLM must conduct. How much habitat remains across both the District, and region – and how foreseeable are large-scale losses from wildfire, as well as purposeful manipulation.

NGO-WWP-Fite-27

The series of recent fires in the sagebrush of the Idaho Jarbidge BLM lands in 2010 illustrates the nonsense associated with replacing shrubs with grass. In fact, this Jarbidge area that is 90 percent or more seeded perennial grass –and it just burned yet again. In the course of around two days, nearly 300,000 acres burned in the recent Long Butte fire. Yet this area was in one of the Fuels condition classes that BLM fire personnel claim under fuels modeling and the FRCC schemes is supposed to be able to limit and reduce fire. FRCC is in no way, shape or form a suitable basis for managing the beleaguered weed-vulnerable Winnemucca lands. Perhaps if you were writing an RMP for spruce-fir forests in Pacific Northwest this might be relevant. But it is nonsense for the Great Basin deserts and very arid mountain ranges.

Winnemucca BLM has conducted a whole series of haphazard and wasteful "fuels" projects that have destroyed big sagebrush with mowing, hacking, and herbiciding and other methods of destruction (Williams Stock, Little Owyhee, Lone Willow, now west side of the Santa Rosa Range – and likely imminently in the Montana Mountains and elsewhere. In place of shrubs BLM is planting grasses that serve to extend the fire season, and burn contribute to landscapes burning in a flash. The very grasses that BLM is planting and especially the highly unpalatable crested wheatgrass and over-sized cultivar grasses are NOT native ecotypes. These species have now been shown in the Jarbidge to do nothing to stop fires. In fact, these grasses allow whole landscapes to burn – literally in a flash. Areas without shrubs - including fuelbreaks that are grass that Winnemucca has herbicided, mowed, crushed and hacked sagebrush to produce – dry out earlier, and thus the fire season is **prolonged**. These hotter, drier sites are especially prone to cheatgrass infestation. Grazing disturbance, which is ubiquitous on nearly all BLM lands, promotes trampling of the interspaces – so the volatile mix of large grass, overstocking and excessive trampling promotes, rather than impedes frequent large-scale fires.

Responses

NGO-WWP-Fite-24:
BLM defined its cumulative effects boundary based on the Land Resource Region and Major Land Resources Areas of the United States, USDA, Agriculture Handbook 297. The boundary recognizes areas including Fallon, Lovelock area, Humboldt area, Malheaur High Plateau area and Owyhee High Plateau Area within the western Rangeland Irrigation Region. BLM used this approach as land resource units are characterized by a particular pattern of soils, water, climate and land uses.

Figure 3-21 depicts fire history and table 3-20 provides a 22 year fire history. Many of these fires have had Emergency Stabilization and Rehabilitation treatments applied. ES&R projects have been identified in table 3-24.

NGO-WWP-Fite-25: Comment noted.

NGO-WWP-Fite-26: Cumulative effects were analyzed by section in Chapter 4. Fire history information was provided in chapter 3 – Table 3 -20.

NG0-WWP-FITE-27:
BLM complies with the Healthy Forest Restoration Act of 2003. BLM uses FRCC as one tool with respect to fuels management. BLM collaborates with federal, state and tribal agencies in an effort to construct strategically placed fuelbreaks in an effort to protect wildland urban interface areas, and thousands of acres of critical wildlife habitat, including habitat for LCT, Sage-grouse, pygmy rabbit, and provide for public and fire fighter safety. The fuelbreaks are intended to stop or slow the spread of wildfires. In many instances fuelbreaks are constructed using mosaic patters keeping portions of the shrub component on place. BLM strives to use existing disturbed areas for placement of fuelbreaks. BLM combines unburned habitat restoration with many of these fuels projects. Section VR4 provides a range of alternatives that include improving conditions classes of vegetation from Class 3, high departure to Class 2 to moderate departure. In addition fuelbreaks are maintained and monitored to ensure they remain effective to change fire behavior.

NGO-WWP-Fite

Comments

There is no basis for use of the term restoration if BLM is planning on disturbance of native communities, and replacing native species with pseudo-native large-sized "cultivars" and exotic "perennials".

NGO-WWP-Fite-28

The full present and foreseeable scale of loss of these communities in BLM adjacent lands – including Surprise FO under various manipulation/treatment scenarios (Sagestep) - must be fully examined to understand how much loss of these targeted native communities may be occurring.

Instead of "restoring" habitat, such native vegetation killing and disturbance projects seem more aimed at wiping out critical denser sagebrush habitats for species like Sage Grouse and Pygmy Rabbit, through extensive removal and fragmentation of essential habitat components. In the absence of these imperiled species, industry may have unfettered development access. That way, the pesky species won't be a problem for ranchers, miners, or energy developers.

It is impossible to understand why the word "improve" is used in relation to FRCC. FRCC 3 is mature or old growth native communities. These older communities are the precise communities that are increasingly rare and scarce, along with the animal and plant biota dependent on them. FRCC 2 has very few shrubs. FRCC 1 is pretty much bare dirt and a little grass.

NGO-WWP-Fite-29

No valid Baseline has been provided of how much annual grassland, presence of cheatgrass, halogeton, crested wheatgrass, etc. exists, or that identifies sites/land areas vulnerable to these weeds if the sites are disturbed in expensive Fuels or other projects.

NGO-WWP-Fite-30

Likewise, there is no basis for understanding why "restore" is used for purposeful disturbances that often destroy sagebrush/shrubs/trees and pave the way for weed invasion. BLM must clearly identify precisely the lands targeted for any manipulation and after defining restoration, identify where and how this would occur. Why not use any available funds to target restoration of native vegetation components to weedlands and crested wheatgrass?

NGO-WWP-Fite-31

There is no reason that only one or a few ACEC would exist under any alternative. Greatly expanded consideration of sagebrush (Sage Grouse, Pygmy Rabbit), Salt Desert Shrub and other ACECs must be developed as a Supplement to the DEIS.

NGO-WWP-Fite-32

There is no reason that disposing of two million acres of BLM lands would allow for "sustainable development" – this amount of disposal would promote cancerous growth, would not be in compliance with Conservation Plans for Sage Grouse and other sensitive species, and protection of other critical values of the public lands. Habitat connectivity, protection of playas and salt desert shrub communities and other goals must be emphasized. We are particularly concerned that some of the areas mapped for disposal are areas where politically connected parties have long sought to acquire public lands for private gain. BLM should manage for no net loss of public lands.

How can an action be a "resource benefit" under one Alternative, but not others?

NGO-WWP-Fite-33

This section is supposed to be summary, but many harmful provisions of this alternative related to resource values and important and sensitive species are not provided here.

8

Responses

NGO-WWP-Fite-28: The Final FEIS/RMP was updated to show the fuel treatment and Emergency Stabilization and Rehabilitation acreages. Reference Tables 3-20 and 3-24.

The BLM is mandated to use FRCC according to the Healthy Forests Restoration Act of 2003. A description of FRCC 1 is "Moderate departure form the natural (historical) regime of vegetation characteristics; fuel composition; fire frequency, severity and pattern; and other associated disturbances."

NGO-WWP-Fite-29: Table 3-10 provides acres of each plant community /association in the district. Figure 3-9 depicts sagebrush and saltbush scrub, Figure 3-10 depicts Desert Sink scrub and riparian woodlands, Figure 3-11 depicts perennial and annual grasslands. Figure 3-12 shows historical weed infestations in the district. Table 3-10 has been updated in the FEIS/RMP.

NGO-WWP-Fite-30: Land identified for manipulation occurs on a case by case basis after collaboration with other federal, state and tribal agencies. Separate NEPA and public involvement also occurs one projects are defined.

NGO-WWP-Fite-31: BLM considered ACECs in a range of alternatives. Alternative A current management reflects the only one ACEC designated. Alternative D recommends maintaining the existing ACEC and recommends the addition of 3 new ACECs. In addition various Alternatives in the RMP designate large areas as avoidance and exclusion areas.

NGO-WWP-Fite-32: The lands depicted in the DRMP are suitable for possible disposal. A proposed disposal must meet all of the criteria stated in FLPMA and those outlined in the PRMP. See D-LR 3.1. No lands will be disposed of that have critical values.

NGO-WWP-Fite-33: Refer to C-VR 2.1 Option One and C-VR 2.1 Option 2, Alternatives B and D.

NGO-WWP-Fite

Comments

There is no mention of livestock grazing here. Given the vast weedlands, and increasing adverse effects of climate change on top of the desertification processes caused by chronic grazing and other disturbances, there is no assurance that what canny be interpreted as the status quo stocking, including many "paper cows" on permits, is part of this action. The EIS is greatly lacking in detailed information necessary to understand the current Baseline for livestock, and to develop alternatives and analyze outcomes of the various alternatives. For example, if continued stocking allocations occur at current levels, the long-term success of ANY restoration project is likely to be non-existent – and projects, though extremely expensive, be trampled and grazed to weeds. Detailed livestock monitoring and use information must be provided in Appendices and analyzed in the EIS.

NGO-WWP-Fite-34

Detailed mapping and analysis of all existing range facilities – and the changes since the old LUPS – must be provided. Then, all the current science on the deleterious and adverse effects of these facilities must be provided. A series of alternatives aimed at removing and reducing the Footprint of facilities and livestock must be developed.

Actual use by livestock or all areas for all years available must be provided. A series of alternatives with average Actual Use as the understanding of grazing use levels that have caused current problems must be developed. Instead, a reader of the EIS is faced with a meaningless 390,000 AUM figure that includes many "paper cows".

NGO-WWP-Fite-35

There is no valid basis for allowing crosscountry travel on a large area of the FO under any alternative. Dust from grazing and OHV use factor into climate change processes and those impacts must be fully examined here. The arid vegetation communities here are greatly vulnerable to disturbance, and weed expansion including with climate change effects. Plus, playa surfaces disturbed by OHVs contribute large amounts of dust to the area. All of this must be factored into any analysis of "sustainability" in developing an alternative, and the adverse effects of an alternative in any analysis. Map a few limited cheatgrass play areas by towns under this Alternative, and be done.

The link between livestock facilities and management and roading must also be examined – which roads and trails developed in relation to facilities? How can these be reduced minimized, and lands and habitats restored?

Please provide comparative info on dust from disturbed soil/microbiotic crust and playa surfaces – compared to undisturbed areas.

NGO-WWP-Fite-36

Alternative C Option 1.This is supposed to develop management strategies to improve and protect ecosystem health. But isn't the BLM required to do this under all Alternatives – thus rendering the full throttle development and massive land disposal of Alternative B a non-starter as a viable alternative?

NGO-WWP-Fite-37

Comments on Table 2-3 and the EIS Analysis

First, we appreciate BLM placing information in a comparative Tabular form.

Generally, the Table and RMP's Goals, Objectives, Actions are often very similar between alternatives, and also often lack substantial requirements or enforceablility. Some even have built-in "waivers"!

9

Responses

NGO-WWP-Fite-34: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level. Restoration projects would be assessed at an implementation level decision, which would evaluate different treatments. See Section 2.2.2 Anatomy of an Alternative and LG-1.3

NGO-WWP-Fite-35: These comments are addressed at the implementation level planning, such as grazing permit renewals, final multiple use decisions and OHV travel management plan. All of which include separate public outreach and environmental analysis.

NGO-WWP-Fite-36: See response to N-WWP-28.

NGO-WWP-Fite-37: BLM developed a range of alternatives. Alternative B has a more use intensive theme, Alternative C has a more conservation theme. Objectives and management actions related to protecting ecosystem health are included in varying degrees in all alternatives.

NGO-WWP-Fite

Comments

New Ground That Should Be Covered

NGO-WWP-Fite-38

Responsible Energy Project Siting.

Full planning for proper project and development siting on brownfelds, mine waste, cheatgrass or close to other existing developments/degraded areas for all energy, transmission, pipelines and other projects must be included in this EIS process. Other areas should be placed off-limits.

Noise

NGO-WWP-Fite-39

We ask that a new component of **Noise** be added to this list of components of the environment. The growing public outcry over commercial wind farm placement, motorized use at geothermal, mining and other operations, intrude on human and animal environments.

The increasing number of citizens that use the public lands to seek relaxation and freedom from the sights, sounds, and disturbances means that BM must recognize the adverse effects of industrial development, sizzling noises and emissions from high tension lines, military overflight, large-scale roading and other intrusions into a natural environment.

NGO-WWP-Fite-40

There is increasing evidence that road noise, potential high tension line noise, wind farm noise, and other intrusions may affect or displace Sage Grouse or other wildlife.

NGO-WWP-Fite-41

Also, since the human health effects of various high, radio or other electronic device and communication tower emissions currently are little-understood but are likely to be greatly examined over the next 20 years – the life of this Plan – then BLM should develop and RMP that provides for adequately addressing these concerns.

There is already some indication that some of the sounds or wave emissions may have possible adverse effects to wildlife (either due to noise or range of frequencies that are omitted)

Perhaps "Noise" could be included under "Air" – or does it rate a separate category? BLM planners can hopefully figure out where best to place this.

Just like the darkness of night skies, minimizing noise intrusion should be emphasized.

Location and Bundling of Communication and Other Such Sites

Technology keeps changing by leaps and bounds, and more and more structures – including ugly microwave and communication towers keep proliferating. These are often times lighted due to aviation concerns, held up by guidewires and other mooring that just like Wind Met Towers may be lethal to Volant animals – ranging from warblers to bats to dragonflies to Monarch butterflies. Plus, frequencies that such facilities may emit may adversely impact, or attract, migrants that then are killed due to collisions.

NGO-WWP-Fite-42

Siting should be guided by consideration of needs of adverse impacts to volant species as well as sage Grouse and other habitat intrusions. Prior to approval of any siting, migratory animal patterns in the

Responses

NGO-WWP-Fite-38: All Renewable Energy Plans of Developments are required to be reviewed under NEPA. This is a public process.

NGO-WWP-Fite-39: Noise is addressed on a project specific basis or during implementation level planning. Both processes include public involvement and provide applicable analysis for noise.

NGO-WWP-Fite-40: Impacts related to noise are addressed through site specific NEPA analysis for projects proposed in sage-grouse habitat or within important wildlife habitat areas and priority sage-grouse habitat areas. Actions D-FW 1.2 and D-SSS 1.2.1 would apply no surface disturbance and no surface occupancy restrictions within priority wildlife areas. These restrictions would prohibit certain uses thereby limiting noise. These restrictions would apply to ROWs as well as certain mineral activities. BLM would also apply appropriate guidance from BMPs developed in the Programmatic EIS on Wind Energy Development on BLM Administered Lands to address noise.

NGO-WWP-Fite-41: The DEIS has a section devoted to public health and safety (see PS section).

NGO-WWP-Fite-42: CA-SSS 1.2 would require a sensitive species inventory for project proposals. Action D-FW4.1 would require a pre-disturbance inventory for nesting migratory birds. Action D-SSS 1.3.1 would require a pre-disturbance inventory for pygmy rabbit. Action D-SSS 1.2.3 would apply no surface disturbance, NSO buffers near active sage-grouse leks when locating high profile structures (eg, powerlines, wind turbines, towers etc.). BLM would also apply appropriate guidance from BMPs developed in the Programmatic EIS on Wind Energy Development on BLM Administered Lands that addresses inventory and project design to avoid impacts.

NGO-WWP-Fite

Comments

area should be determined by a series of ground and radar, bat echolocation device and other methods to determine if siting would cause adverse effects, and should be denied. Current BLM processes are flawed – for example allowing MET towers to be placed and drive grouse away - prior to full-scale studies being conducted.

NGO-WWP-Fite-42 Cont-d

As part of this RMP process, BLM must conduct at least some baseline studies to understand migration patterns for migratory birds, bats and other animals.

NGO-WWP-Fite-43

Emphasize Protections for Migratory Birds, Bats and Other Aerial Species

The key factor that drives this RMP in the animal realm is Sage Grouse and Big Game. Yet there are many other important species, and concerns, that are not fully and fairly represented here.

Emphasize Importance of Keystone Species, and Apex Predators

Public lands in Nevada have faced a recent rash of proposals that focus on scorched earth predator control and eradication. Full and detailed analysis at the level of an EIS must be required before any such activities could be conducted. Activities shoudl be prohibited in areas of important wildlife habitats, or wild horse HMAs where mountain lions actually can function to at least in part keep wild horse populations in balance.

BLM should strive to provide for large landscapes and inter-connected pathways for large predator movement and dispersal. Right now, with the level of current mining, gravel pits, very high roading, grazing wastelands and other developments in and near the I-80 corridor, movement across this area may be difficult.

Since the RMP plans for elk to increase, then natural dispersal of the Gray Wolf and other predators should be provided for, as well. Otherwise, we have an unnatural prey situation. There is little evidence that elk were very abundant in the Great Basin at the time of Settlement. It is also hard to understand how BLM can propose the status quo livestock allocations – and plan to super-impose large numbers of elk on top of these. This is especially the case since the AUM allocations are already greatly above Actual Use that has occurred in these lands over recent decades in many instances. Such critical info (Actual Use from the time of the MFP t the present, and the various categories of AUMs) are never provided. All of this is necessary to understand whether any of the alternatives are grounded in reality – as livestock grazing is the most pervasive chronic disturbance factor adversely affecting native ecosystems across the District.

NGO-WWP-Fite-44

Everything –from a valid understanding of effects on Sage Grouse to an economics analysis can not be conducted unless full info on how many livestock have been stocked where and when is revealed for each allotment, along with a full Baseline of the current Footprint of livestock facilities, associated roading, etc. and consideration of all adverse impacts as well.

NGO-WWP-Fite-45

Environmental Justice/Human Rights Protections in Relation to Permitted Public Lands Activities

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Responses

NGO-WWP-Fite-43: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data. Site specific baseline is conducted on many projects on a case-by-case basis.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-44: BLM is not proposing large numbers of elk but to coordinate with NDOW should pioneering elk become established. (See D-FW 1.5).

NGO-WWP-Fite-45: The current level of authorized grazing was provided in the RMP. This will be analyzed in project specific plans. BLM has furnished maps or figures suitable for an RMP analysis. Refer to Appendix A.

NGO-WWP-Fite	Comments	Responses
	Treatment of ranch and herding workers is increasingly a topic of public concern, and also involves basic human rights issues at times, as well. Herders may be required to live in primitive conditions all winter, or for prolonged periods of time, lack medical care, or suffer other abuses.	
NGO-WWP-Fite-46	Full analysis of the effects of exposure to livestock diseases, living conditions such as associated with sheep camps on public lands, workers forced to stay against their will, and other concerns must be provided here. Domestic sheep and other livestock diseases harbor diseases like Q fever that contaminate soils, an other air or waterborne pathogens harbored by livestock that herders and workers may be exposed to on public lands must be fully considered.	NGO-WWP-Fite-46: Impacts from livestock grazing are analyzed in Chapter 4 by resource and use.
	Public Health and Safety Related to Grazing or Other Activities	
NGO-WWP-Fite-47	There are increasingly conflicts between aspects of livestock grazing and the public. For example, large herding dogs typically used with domestic sheep have in many instances attacked or intimidated members of the public. Recent news reports of incidents in Colorado as well as Idaho (two dog attacks from same sheep operation in two years), necessitate full consideration of such effects and incompatibility of grazing use with areas of important recreational or other use, and/or permit terms and conditions requiring controls. Livestock cause accidents and endanger human lives. Despite outdated Open Range laws - BLM can act to control land areas and season of use to limit these conflicts.	NGO-WWP-Fite-47: Comment noted.
	Air Table 2-3	
NGO-WWP-Fite-48	The Table goals, objectives and actions fail to incorporate consideration of the adverse effects of dust and airborne soil erosion promoted by livestock and other disturbances to soils, microbiotic crusts, and playas surfaces. There is scientific concern about the role of disturbed, wind-erosion prone and blown soil in promoting early snowmelt and other adverse conditions that amplify the effects of climate change, such as early snowmelt.	NGO-WWP-Fite-48, 49: Refer to Alternatives B, C and D for actions AQ 1.2: "Minimize or reduce adverse impacts on air quality from BLM and BLM-authorized activities by implementing BMPs and mitigation measures on a case-by-case basis." Primacy for air quality has been delegated from EPA to the State of Nevada. Nevada has adopted state Ambient Air Quality standards equal to or more stringent than comparable federal standards. These standards are listed on Table 3-1.
NGO-WWP-Fite-49	We are concerned that throughout this EIS, playa and other low elevation areas are sacrificed to surface-disturbing uses. How much will windblown dust erosion be increased by OHV and other playa disturbances? There is no analysis of this, or measures to prevent or minimize it through limiting activities in erosion-prone areas.	
NGO-WWP-Fite-50	Idaho and other downwinders have suffered from many effects of pollution emanating from Nevada. For example, some of the highest levels of cancer resulting from the NV test site nuclear activities were found in central Idaho. In recent years, the mercury air pollution from Nevada gold roasting operations has polluted Idaho, Utah and other waters. Cement plats are increasingly implicated in mercury release and pollution of air and water. Before BLM permits any of these activities, including even more mining and processing that will exacerbate pollution, full consideration must be given and limits be placed on allocations that may cause these adverse pollutants.	NGO-WWP-Fite-50: Refer to Alternatives B, C and D for actions AQ 1.2: "Minimize or reduce adverse impacts on air quality from BLM and BLM-authorized activities by implementing BMPs and mitigation measures on a case-by-case basis."

NGO-WWP-Fite

Comments

NGO-WWP-Fite-51

In order to produce a valid RMP, please estimate the Baseline of pollution currently coming from these activities in the RMP area.

NGO-WWP-Fite-52

Class I airshed analysis must include downwind airsheds. There is no adequate consideration of haze, and ways to minimize it.

NGO-WWP-Fite-53

We are greatly concerned about the prolonged periods of unnatural air pollution from agency prescribed burns – in both spring and fall. These burns not only cause health problems for humans, they also mar visual settings and recreational uses. Use of fire should be minimized in the cheatgrass-prone Winnemucca lands anyway.

Please also see out preceding comments about Radio frequency and other emissions above.

NGO-WWP-Fite-54

We also note that with development of renewable energy, there are several areas of air pollution concern that must be addressed. One is the potential for toxic gases or material to be released in geothermal processing - if waters contain significant levels of harmful minerals, or if "fracing" chemicals are used. Please see later discussion of "fracing" and other hazardous activities.

NGO-WWP-Fite-55

It is readily foreseeable that all manner of rare earth material used in renewable or evolving technologies may be sought on public lands in Nevada. Full effects of potential air and water pollution from their exploration, mining and processing activities must be considered. A Baseline of the harms already known to be occurring must be provided as well as a review of current knowledge of adverse pollution effects where such activity currently occurs. For example, in areas of China that have undergone mining for rare earths used in wind turbines or new electronics, serious pollution has resulted.

NGO-WWP-Fite-56

BLM must also consider the adverse effects of aerial or large-scale ground-based application of herbicides or pesticides – especially the adverse effects of "drift". Often, use of herbicides is a result of chronic grazing, roading and other disturbances, and minimizing those disturbances is key to prevention of air and water pollution including pollution when wind-eroded soils are deposited in water.

Geology

We are concerned that important and unique playa and dune areas are sacrificed to disturbances under grazing, recreation, mining and other parts of the RMP.

NGO-WWP-Fite-57

There are many more outstanding geologic features in Winnemucca BLM lands than the few areas listed here – from earthquake faults to untrammeled alluvial fans to playa features. A much-expanded analysis must occur, and the highlighted areas must be kept free of developememt.

Soil

NGO-WWP-Fite-58

While it is nice to have a Goal of reducing soil erosion, the reader of the EIS is provided with no current information on rates of soil erosion, or level and severity of desertification, across the RMP area.

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Responses

NGO-WWP-Fite-51: Proposed goals, objectives and management actions relating to air quality are located in AQ section (p. 2-27). The Affected Environment for Air Quality is located in Section 3.2.1.

NGO-WWP-Fite-52: Refer to Air Quality Objective for C and D AQ-1.

NGO-WWP-Fite-53: Refer to Alternatives B, C and D for actions AQ 1.2: "Minimize or reduce adverse impacts on air quality from BLM and BLM-authorized activities by implementing BMPs and mitigation measures on a case-by-case basis."

NGO-WWP-Fite-54: Refer to Alternatives B, C and D for actions AQ 1.2: "Minimize or reduce adverse impacts on air quality from BLM and BLM-authorized activities by implementing BMPs and mitigation measures on a case-by-case basis."

NGO-WWP-Fite-55: Before any permit is issued a NEPA process is conducted to analyze the specific material for that project and impacts on a case-by-case basis. RMP addresses water and air quality issues under CA -WR1 and CA-AQ 1.1.

NGO-WWP-Fite-56: Before any permit is issued a NEPA process is conducted to analyze the specific material for that project and impacts on a case-by-case basis. BMPs and SOPs address application procedures.

The RMP addresses water and air quality issues under CA-WR1 and CA-AQ 1.1.

NGO-WWP-Fite-57: BLM revised this section for the FEIS.

NGO-WWP-Fite-58: Addressed on case-by-case basis through site specific NEPA.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-58 Cont-d.

We have repeatedly emphasized in comments to BLM the importance of assessing the current degree of desertification – a significant component of desertification is soil erosion.

The current degree of desertification (see Sheridan CEQ 1982, Steinfeld et al. 2006) is not provided. There is no baseline provided of where significant loss of soil horizons has occurred. All of this is significant – because the "Range Site-Soil" scheme that is being used to justify destruction of native plant communities and replanting exotic or pseudo-native large-sized cultivars claims to be based on soil type (promoted by UNR Range Dept., and also appears to be part of the FRCC morass). Yet if the top layers/horizons of soil have been lost, the ability/potential to support the component claimed to be "healthy" is lessened. So in order to really understand "potential" and the potential for sustainable uses, BLM has to provide info on the current degree of loss, degradation and desertification.

NGO-WWP-Fite-59

We request at least an Objective related to desertification in Soil, Water, and Climate/Air Sections of the RMP.

NGO-WWP-Fite-60

In order to understand the current status of soils and any level of sustainable use, honest analysis of both the potential for microbiotic crusts (much greater than the RMP map provides), and current areas of intact as well as human-caused depauperate crust areas must be provided.

NGO-WWP-Fite-61

We are astounded to see that BLM currently (No Action) claims to minimize breaking microbiotic crusts. See, for example, recent photos submitted of livestock trampling impacts in Goldbanks allotment.

BLM must provide measurable standards of use related to soil disturbance in both upland and riparian areas. In uplands, trampling impacts to soils and microbiotic crusts must be measured annually in relation to grazing or other disturbances.

For all riparian, springs, seep and meadow areas, livestock trampling disturbance must be minimized - with measurable standards of use applied. Less then 5% trampling of livestock-accessible banks must be a measurable protective Action.

NGO-WWP-Fite-62

Soil compaction must also be limited – including use during periods when soils are too wet.

NGO-WWP-Fite-63

If BLM is really striving to protect soils, then large-scale reductions in livestock trampling disturbance (and thus stocking rates) are necessary components of all action alternatives. Plus, limitations on mining and energy exploration and development must also be provided - including across all the salt desert and other areas that are largely sacrificed to full-throttle development under the RMP. For example, helicopter-based rather than ground-based mining, oil/gas, geothermal etc. exploration must be required in many areas – where soil disturbance, microbiotic crusts in areas of relatively intact crusts, in areas of sagebrush or salt desert or other native trees or shrubs, or where pygmy rabbit, lizard or small mammal burrows, nesting birds, or adverse effects to dune beetle or other species may occur.

Water Resources

NGO-WWP-Fite-64

BLM must provide detailed current baseline data on water quantity and water quality for all water resources. Known changes in flows, wetted lengths/areas, etc. must be detailed.

Responses

NGO-WWP-Fite-59: Although the term "desertification" is not used, management to achieve vegetation goals and objectives, for example, Objective D-VR1, would avoid this.

NGO-WWP-Fite-60: Refer to monitoring standards in the BMPs and SOPs and the Standards and Guidelines for Nevada's Sierra Front-Northwestern Great Basin Area. The BLM has developed a range of alternatives under S 1.1 that address biological crust.

NGO-WWP-Fite-61: BLM has developed a range of alternatives with respect to stream bank, shoreline, and channel stability is provided under FW 9.31.

NGO-WWP-Fite-62: BLM has developed BMPs/SOPs and a range of alternatives and management actions for soils that address land use.

NGO-WWP-Fite-63: Action S 1.6 addresses soil compaction and conditions through a range of alternatives.

NGO-WWP-Fite-64: The BLM works to systematically monitor these items to help assess trends and inform individual decisions. FLPMA Sec. 202(c) (4) gives BLM the discretion to "rely to the extent it is available, on inventory of the public lands, their resources and other values." Alternatives were developed using existing available data.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite

	Comments	Responses
NGO-WWP-Fite-65	How is a "healthy" watershed defined?	NGO-WWP-Fite-65: A healthy watershed are those that comply with the standards for rangeland health under the Standards and Guidelines for Nevada's Sierra Front-Northwestern Great Basin Area and consistent with other BLM policy and guidance.
NGO-WWP-Fite-66	How many segments of streams have become intermittent, gullied, or dried up altogether under No Action.? The mapping of Priority watersheds shows only a handfull are considered important. Vol. 5, 2-4 and 2-5.	NGO-WWP-Fite-66: These data are not available. Priority watersheds were identified as those containing T&E species habitat, both occupied and recovery and those containing municipal watersheds.
NGO-WWP-Fite-67	The RMP should prohibit the use of all "fracing" chemicals or similar explosives and chemical brews in geothermal, oil and gas, or other explo or development. The documentary "Gasland" highlighted the serious adverse effects of use of these substances and contamination of ground and surface waters.	NGO-WWP-Fite-67: The impacts of these compounds will be analyzed on a case-by-case basis.
NGO-WWP-Fite-68	Many of the mining activities - and now it appears geothermal activities that BLM manages result in changes in, and ultimate depletion, of ground and surface waters. What is the current depletion level? How is expected to change under all alternatives? How might water export schemes affect this further?	NGO-WWP-Fite-68: BLM will assess any proposed projects individually to determine if potential impacts can be sufficiently mitigated.
NGO-WWP-Fite-69	Where is a map of all mine aquifer drawdown areas? Of any potential aquifer "mining" water export areas? Of all geothermal developments at present? Expected developments over the next 10-20 years?	NGO-WWP-Fite-69: BLM produced maps sufficient for a RMP level analysis. Depending on market conditions, "expected" developments could range from zero to covering virtually the entirety of the Basin and Range Province.
NGO-WWP-Fite-70	Where are all diversions on BLM land, and how do they affect water resources, riparian areas, habitats?	NGO-WWP-Fite-70: These activities have the potential to pollute or draw down groundwater, however these impacts are not a certainty. These activities would require greater analysis during implementation level analysis prior to permitting.
NGO-WWP-Fite-71 -Water Resources	Which watersheds are currently "healthy", and how does gullying, erosion, lowering of water tables, etc. affect perennial surface flows? What is the expected drawdown rate vs. recharge rate for aquifers?	NGO-WWP-Fite-71: BLM has ROW records on master title plats. However, not all diversions are included, especially old or historic diversions or ditches. Impacts from proposed new diversions are addressed on a case by case basis with separate public involvement and NEPA analysis. The BLM systematically monitors riparian health irrespective of water diversions.
NGO-WWP-Fite-72	Please review in detail WWP Scoping and other comments on springs and seeps and incorporate information in a SEIS. We have re-submitted those comments as part of the current process.	NGO-WWP-Fite-72: Healthy watersheds are those that comply with the standards for rangeland health under the Standards and Guidelines for Nevada's Sierra Front-Northwestern Great Basin Area and consistent with other BLM policy and guidance. It would be assumed, in general, that gullying, erosion, and the lowering of water tables would lead to decreases in perennial surface flow.
NGO-WWP-Fite-73	The mapping of "Priority Watersheds" does not seem to reflect the info in Table 2-3. For example, where is a map of LCT watersheds?	NGO-WWP-Fite-73: This is dependent on the rate of pumping, aquifer characteristics, and precipitation.
NGO-WWP-Fite-74	We are greatly concerned that there is no mapping of springs, seeps and remaining perennial areas of flow, as well as seasonal flow areas of riparian systems.	NGO-WWP-Fite-74: Priority watershed include LCT occupied and recovery areas – See D-WR 1.1.
NGO-WWP-Fite-75	How might mining, geothermal, fracing and other activities pollute or reduce aquifers related to high priority areas?	NGO-WWP-Fite-75: The BLM has provided sufficient maps or figures for an RMP analysis.
NGO-WWP-Fite-76	Why is there no requirement for mandatory annual testing of grazed areas for bacteria and other pollutants?	NGO-WWP-Fite-76: The requirements for water quality are addressed in the Standards and Guidelines for Nevada's Sierra Front-Northwestern Great Basin Area.
	Vegetation – Forest Woodland	
NGO-WWP-Fite-77	An Objective should be added to "Preserve and enhance juniper and pinyon forests".	NGO-WWP-Fite-77: Objective D-VF-3 includes maintaining, improving and protecting pinyon and juniper stands.

NGO-WWP-Fite	Comments	Responses
NGO-WWP-Fite-78	We are concerned at the provision for "natural fire regimes". The definition and time interval for a "natural" regimes keeps changing. See for example, Baker (2010), Baker and Shinneman's work, and many other recent papers that significantly alter the abbreviate fire regimes favored by range workers who seek to manipulate native plant communities. Full suppression of fires in many areas must now be emphasized since cheatgrass is such a threat. Further, any understanding of a "natural" fire regime in the greatly altered vegetation communities of the Great Basin keeps changing.	NGO-WWP-Fite-78: Full fire suppression is addressed in D-WFM 1. Conditional fire suppression areas are identified in WFM 1.1, alternatives B & D. Also, see figure 2-11 Under objective VF 3 a range of alternatives are applicable for fire suppression in Pinyon/Juniper stands or areas. In addition, proposed ACECs that contain Pinyon/Juniper, have been prioritized for suppression see Action D, ACEC 1.1
NGO-WWP-Fite-79	Fire suppression should be prioritized to protect other important remaining pinyon-juniper and other forested areas.	NGO-WWP-Fite79: Wildland Fire Ecology Management – CA-WFM1 prioritize fire suppression for forest resources in the District
NGO-WWP-Fite-80	Detailed mapping and analysis of age class, and condition of all forested areas, as well as impacts of historic mining and BLM treatments from all time periods, on vegetation communities must be provided.	NGO-WWP-Fite-80: The BLM has provided sufficient maps for an RMP analysis. Mapping has been provided for old growth forests Appendix A Figure 2-2. Additional maps will be updated in the FEIS/ RMP.
NGO-WWP-Fite-81	As part of this RMP, all old growth and mature stands should be identified, and provisions added to protect these sites from mining, energy (including "renewables", and other disturbance and degradation. It is absurd to include an Alternative that would not even allow for consideration and designation of old growth (see 2-43).	NGO-WWP-Fite-81: A range of objectives and management actions applicable to old growth forests is provided in Section VF 4. Figure 2-2 identifies the locations of Old Growth Forests.
	There is no provision to limit livestock or other degradation to understories in forested communities.	
NGO-WWP-Fite-82	The role of lower elevation juniper in providing ferruginous hawk or other important nesting sites must be included.	NGO-WWP-Fite-82: A range of management action alternatives applicable to raptors is provided in Section SSS 1.6.
NGO-WWP-Fite-83	There should be an emphasis on pine nut harvest and other forest products. What is the pine nut production potential of these lands – when needs of wildlife and cultural uses are taken into account?	NGO-WWP-Fite-83: A range of alternatives including objectives and management actions applicable to Pinyon/Juniper and pine nut harvesting have been provided in CR 10 and VF 3.5.
	Nevada's pinyon pine forests are essential in providing large-seeded pine nuts as food for the Pinyon Jay and other native wildlife like the charismatic seed-caching Clark's nutcrackers that is suffering catastrophic losses of food sources over a large area of its range in the Intermountain West.	
	Die-off of whitebark pine, foreseeable dire-off of limber and bristlecones, and the loss of Pinyon Pine in the southwest all highlights the importance of Nevada's remaining pinyon-juniper forests.	
	Vegetation/Weeds	
NGO-WWP-Fite-84	Objectives and Actions must provide concrete measures to prevent weed infestation and spread. Specific measures to limit disturbance and provide required measurable standards of trampling and other disturbance to soils and microbiotic crusts must be considered.	NGO-WWP-Fite-84: A range of alternatives including objectives and management actions have been provided in VW 1.
NGO-WWP-Fite-85	Specific conservative measurable standards of use for vegetation in upland and riparian areas must be required. 10% use on native perennial species is a conservative standard of use that must be considered to provide necessary habitat requirements, as well as limit expansion of invasives.	NGO-WWP-Fite-85: BLM developed a range of alternatives as part of integrated vegetation management. VW 1 and VR 4.3 BLM also identified BMPs and SOPs with respect to chemical treatments.
NGO-WWP-Fite-86	BLM's Goals, objectives and action fail to address Integrated Weed Management related to livestock grazing. Full consideration of Goals and Actions to prevent livestock use of infested areas, prevent	NGO-WWP-Fite-86: BLM has developed a range of alternatives. See Alternative C.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-86 Cont-d.

spread through trailing or transport, and to quarantine livestock before turnout on public lands must be included.

If BLM is to comply with its stated Goal, or minimize adverse effects of weeds, then identification of intact vegetation communities and clear and immediate measures to remove disturbance of livestock grazing in these areas must be a part of a series of action Alternatives.

NGO-WWP-Fite-87

A full livestock grazing Capability and Suitability determination process must be conducted to provide informed decisionmaking on allocating any continued use for livestock and developing a suitable range of alternatives under this RMP. Cumulative impacts of multiple disturbances and uses in an area must also be limited. Grazing or other disturbances to non-capable or unsuitable lands may result n weed proliferation.

Chem and Bio Control

NGO-WWP-Fite-88

BLM's Goal must be to limit disturbances especially to intact lands, and thus reduce any need for use of Chemical or BioControl.

NGO-WWP-Fite-89

Pesticide use on public lands should be limited, including APHIS application of grasshopper and Mormon cricket killers. Since APHIS spraying EIS admits that these insects thrive on degraded lands - efforts to restore degraded lands most prone to insect problems must be emphasized. We are strongly opposed to any aerial application of herbicides or other biocides and ask that alternatives include this.

These are also native insects and are a part of a healthy native ecosystem – so heavy-handed control measures are of concern.

NGO-WWP-Fite-90

Application of Oust, Plateau, or other cheatgrass/broadleaf germination inhibitors are largely ineffective, and have significant potential for drift or harm to non-target plants. Unless these chemicals are applied every year, cheatgrass will just return – especially with grazing disturbances.

NGO-WWP-Fite-91

Use of persistent poisons like Tordon should be outlawed on public lands, as should the use of the shrub killer Teburthiuron that Winnemucca has strewn across the Little Owyhee and other watersheds in recent years to kill sagebrush.

NGO-WWP-Fite-92

The full adverse role of BLM's various "Fuels" and other treatment disturbances to native vegetation communities in contrbuiting to use of herbicides or other bicides must be examined. The basic scenario is this: BLM kills (mows, thins, herbicides) sagebrush. This results in a hotter, drier site. Cheatgrass invades, especially with continued grazing disturbance.

NGO-WWP-Fite-93

Where is a baseline map and analysis of all veg communities where herbicides have been used to kill native species?Are these chemocals accumulating on playas, in water tables, or other areas?

Vegetation-Rangeland

NGO-WWP-Fite-94

A Goal should be to protect Old growth and mature sagebrush, salt desert shrub and other communities. These are precisely the communities that are declining and decreasing across Nevada BLMlands.

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Responses

NGO-WWP-Fite-87: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-88: Goal for Chemical and Biological Control is located in Table 2-1.

NGO-WWP-Fite-89: Specific chemical treatments and application methods are addressed on a case-by-case basis. No pesticide use was included in alternative C.

NGO-WWP-Fite-90: BLM uses BLM approved herbicides.

NGO-WWP-Fite-91: See response – NGO-WWP-Fite-90.

NGO-WWP-Fite-92: Impacts from proposed fuels and weed treatments were analyzed in Chapter 4.

NGO-WWP-Fite-93: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-WWP-Fite-94: Vegetation – Rangeland goal is to protect, maintain, and improve healthy vegetative communities with various age classes.

NGO-WWP-Fite

	Comments	Responses
NGO-WWP-Fite-95	Management emphasis must be on native communities – using local native ecotypes, not coarse hybrids of natives that have been bred for forage purposes and size.	NGO-WWP-Fite-95: BLM developed a range of alternatives. VR 1.3
NGO-WWP-Fite-96	We are concerned at the use of non-natives, including forage kochia, and even more cwg/swg and other exists by BLM. ALL areas currently comprised of exotic perennial grasses or shrubs must be identified, and a schedule developed for removal/restoration. In many areas, seedings were done as "emergency" stabilization following fires. Yet the exotic species were never removed, along with many miles of harmful fencing as well. Please provide a baseline of all such seedings, facilities – and prioritize removal.	NGO-WWP-Fite-96: BLM developed a range of alternatives. VR 1
NGO-WWP-Fite-97	Sagebrush should be managed as a special Emphasis species. We are strongly opposed use of prescribed fire in any native shrublands.	NGO-WWP-Fite-97: Most priority habitat areas focus on sagebrush habitat for sagebrush obligate species; there are numerous management actions applicable for these areas. See D-FW1.1 and D-FW1.2. Sage-brush management is addressed in VR 6.
NGO-WWP-Fite-98	We are oppose "treatments" of native shrublands. These are invariably done to promote livestock forage. Yet livestock use - which has caused the problem in the first place – continues under extremely high levels under this RMP.	NGO-WWP-Fite-98: Comment noted.
NGO-WWP-Fite-99	We are opposed to "short-term prescriptive grazing". "Decadent" vegetation is often critical wildlife habitat. The provisions for this grazing use are laughable - the "entire" critical growing season, and other such nonsense. Why in the world isn't BLM developing a 2010 RMP that eliminates ALL critical growing season use? This is when Sage Grouse and migratory birds are nesting, as well as Pygmy Rabbit young found in natal burrows.	NGO-WWP-Fite-99: Management of wildlife habitat, sensitive species habitat, migratory birds, and Pygmy rabbits are located in the FW and SSS Sections of Table 2-1.
NGO-WWP-Fite-100	A greatly revised Goal, Objectives and Actions must be provided that serve to protect and enhance mature and old growth vegetation communities, that employ current ecological science on microbiotic crusts and the importance of shrubs like sagebrush as plant community anchors and keystone species must be provided.	NGO-WWP-Fite-100: Management of Old Growth Forests are addressed in table 2-1, see VF 4. New management of white bark pine has been included.
NGO-WWP-Fite-101	Where relatively intact vegetation communities, BLM must map and identify thee based on current ESI, weed mapping and other data, and act to develop a range of alternatives to systematically de-stock and/or end grazing disturbance in these areas.	NGO-WWP-101: Mapping of historical weed infestations are provided in Chapter 3-Figure 3-12 .
NGO-WWP-Fite-102	FRCC is not a valid basis for managing shrub communities the Great Basin. Info on fire disturbance intervals is ever-evolving. Reducing shrubs o FRCC 2 commonly aims to promote livestock forage grasses. It is the FRCC communities that are most at risk, and where great losses have occurred. Reducing disturbance (livestock, mining explo, etc.), rather than imposing more through sagebrush or other shrub mowing, hacking, herbiciding or other disturbance should be emphasized. All the sagebrush fire intervals by Miller and other "range" folks that BLM relied on at the time of the AMS, are now known to be much too short.	NGO-WWP-Fite-102: D-VR 4 and D-VR 4.1 address improving FRCC from class 3 to class 2.
NGO-WWP-Fite-103	What is meant by "treating areas using biological and mechanical means" (2-55). Is this covering up a BLM proposal to impose severe dustbowl-like livestock grazing? We again emphasize that local native ecotypes should be seeded.	NGO-WWP-Fite-103: Biological and mechanical treatment have been further defined in the glossary of the FEIS. Action D-VR 4.1 addresses seeding priority with locally collected native seed.

NGO-WWP-Fite

Comments

There is little evidence that fuelbreaks actually protect sagebrush or other communities in rangelands". And in fact, the kind of fuelbreaks that BLM seeks to impose are likely to only exacerbate fire problems through promoting cheatgrass, causing hotter drier sites, and in imposing artificial dense seedings of large-statured unpalatable plants.

NGO-WWP-Fite-104

Winnemucca BLM has woefully failed to map, analyze and develop a reasonable range of alternatives addressing the habitat fragmentation. Overlaying cheatgrass and other infestations, dense livestock facilities and roading, and other factors must be done to understand the current location and status of fragmented landscapes.

BLM repeatedly refers to multi-age stands, yet nearly all the shrub communities already exist as multi-age stands. These stands are often comely interspersed with varying shrub types depending on soils topography, etc. It is a common "myth" of range and the livestock industry that sagebrush and other communities are not "diverse". Diverse here just really means "not disturbed and fragmented by human manipulation".

NGO-WWP-Fite-105

While BLM provides near-identical alternative actions to improve salt desert and sagebrush communities, they are focused on increasing disturbances through manipulation, combined with near-status quo grazing disturbance. There is no evidence that such actions will be effective –and in fact it is much more likely these actions will exacerbate ecological problems and further degraded habitats. Recovery of understories can and does occur if livestock grazing is removed, or greatly reduced. Why are you not considering this?

NGO-WWP-Fite-106

Fuelbreaks are NOT a method to improve vegetation communities. In fact, the more open and grassy lands are, the faster wildfires are sweeping through them. The prime example is the recent Long Butte fire in the Jarbidge that burned 300,000 acres –almost all the acreage burned in only two days. 90% or more of the lands burned were grasses, like crested wheatgrass that BLM plants in Fuelbreaks. Plus, previously planted "Fuelbreaks" were consumed in that fire and ineffective. Fuelbreaks promote weeds and dry out earlier, thus elevating fire risk.

Riparian and Wetlands

NGO-WWP-Fite-107

The Goals, Objectives and Actions for riparian communities are greatly inadequate. PFC is a MINIMU state that riparian wetland areas should be in. A full set of riparian and wetland habitat components must be improved, not just the highly subjective PFC. PFC does not ensure necessary habitat components for aquatic species (LCT, springsnails, other native aquatic biota) or other wildlife –such as Sage Grouse brood raring, warbler nesting, etc. Plus, BLM under the Preferred Alternative doesn't even require that riparian areas meet PFC – just that they be FAR "upward".

NGO-WWP-Fite-108

The time intervals for improvement are much too long. There is a limited range of alternatives why is 85% by 2028 found in several alternatives.

NGO-WWP-Fite-109

BLM provides no baseline of MFP-period community condition, and the "existing" 2010 riparian conditions including springs and seeps, changes in perennial segments, head-cutting and degradation and loss of wet meadows, etc. Since the EIS states existing conditions will be improved, these need to be aid out in detail.

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Responses

NGO-WWP-Fite-104: As required by CEQ Regulations 1503.4, BLM modified alternatives, supplemented and improved the analysis, made factual corrections and responded to substantive comments in developing the PRMP.

NGO-WWP-Fite-105: BLM developed a range of alternatives. VR 6 and VR 7. Alternative C Option 2 addresses removal of all livestock. Livestock can be removed under all alternatives depending on specific circumstances. Refer to LG 1.3.1.

NGO-WWP-Fite-106: BLM uses FRCC as one tool with respect to fuels management. BLM has coordinated with federal, state, local agencies and tribal governments in an effort to construct strategically placed fuelbreaks in an effort to protect wildland urban interface areas, and thousands of acres of critical wildlife habitat, including habitat for LCT, sage-grouse, pygmy rabbit, and provide for public and fire fighter safety. Section VR4 provides a range of alternatives that include improving conditions classes of vegetation from Class 3, high departure to Class 2 to moderate departure. In addition fuel breaks are maintained and monitored to ensure they remain effective to change fire behavior.

NGO-WWP-Fite-107: The Proper Function Condition (PFC) method is a widely used and accepted method for assessing the condition of riparian areas. The BLM has developed a range of alternatives; refer to VRW 1. Spring snail habitat is covered in Objective FW 11, action FW 11.1 and action LG 5.3. LCT habitat is covered in SSS 2.2.

NGO-WWP-Fite-108: The Proper Function Condition (PFC) method is a widely used and accepted method for assessing the condition of riparian areas. The BLM has developed a range of alternatives to improve PFC; refer to VRW 1. Lotic and lentic systems are dynamic and constantly in flux. Naturally occurring events, such as fires or floods, and other impacts, such as roads, land ownership, multiple use, or action outside of the discretion of the BLM (i.e., dewatering, irrigation, etc.) can affect PFC ratings and recovery. BLM has provided a reasonable range of alternatives and PFC percentages for management actions designed to make progress towards PFC.

NGO-WWP-Fite-109: In the PRMP/FEIS Chapter 3 Water Resources identifies impaired waters – Table 3-6, Waters warranting further investigation, Table 3-7 and Summary of Riparian Functioning Condition – Table 3-8.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-110

Both stubble height and required measurable bank trampling standards must be applied under all alternatives.

NGO-WWP-Fite-111

Recovery of riparian areas should focus on integrated watershed measures, not endless band-aid fencing. Requirements for herding, changes in season of use and reductions in livestock so that they can readily be controlled and herded must be the basis for riparian recovery.

We are greatly concerned about the current agency trend to place structures in dying meadows and streambanks then allow grazing to continue right on top of these artificial structures. For example, we have seen the Santa Rosa Forest dump rock on headcuts/gullies – and essentially choke off channels – permanently altering any ability of a drainage to recover flows. Restoration of beavers, watershed recovery, and minimal use of structures must be considered.

NGO-WWP-Fite-112

Projected impacts of geothermal activity, aquifer drawdown and declines across the FO must be integrated with info on current riparian conditions to understand how strong BLM actions must be.

Fish and Wildlife

A much larger area of habitat must be designated as Priority Habitat.

NGO-WWP-Fite-113

Habitat protections must be included in very large ACECs, and must encompass a broader set of wildlife needs.

NGO-WWP-Fite-114

The "Priority Habitat" category BLM applies here has no teeth and little enforceability, and includes a much too limited public lands area - a paltry 1,279,481 acres – almost none of it for salt desert shrub wildlife, or other habitats for species of concern. See also Maps 2-7, 2-8. This mapping doesn't even show the critically important wildlife habitats south of Sheldon and in the vicinity of the Black rock Range that are targeted by the Ruby pipeline development as any Priority. This shows how deficient this RMP is. Where is information incorporating the Mile by Mile analysis (that we note was Grouse and Pygmy Rabbit focused). Aren't all the lands east of the Granite Range of considerable importance, too? Aren't the lands on the non-weedy alluvial fans of the Stillwater Range, Augusta Mountains and other areas critically important for salt desert shrub species (Loggerhead shrike, sage Sparrow, Burrowing Owl, several species of small mammals, reptiles, etc.)? It is baffling to think that BLM forsakes "Priority" habitat status for areas near the Jackson Mountains, on the eastern side of the Santa Rosa Ranger District, and in several other very important areas. There are areas of checkerboard land north and south of I-80, such as lands north of the Toulon Exit are native vegetation communities in fairly good condition due to lack of intensive livestock developments – and that are providing important habitat values.

NGO-WWP-Fite-115

Further, what Criteria were used to separate the Priority 1 and 2 habitats? At a minimum, we request that ALL identified "Priority Habitats" with the addition of areas we discuss above as well as an Overlay of info on plant communities from Nachlinger et al. should be fully considered for ACEC protections due to their relevant and important values.

We would be happy to work with you to provide supporting scientific and other information for ACEC designations for all of these areas.

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Responses

NGO-WWP-Fite-110: Range of alternatives were developed. FW 9.3.1 and FW 9.3.2 addresses streambank alteration. Stubble height standards are covered in Appendix B, Best Management Practices in the Vegetation-Riparian Habitat and Wetlands section.

NGO-WWP-Fite-111: Refer to VRW 1.2.

NGO-WWP-Fite-112: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.

NGO-WWP-Fite-113: Management of ACECs are defined in section D-ACEC-1.2. Management of priority wildlife habitat areas includes use restrictions applicable to saleable minerals, fluid and solid minerals leasing. These areas are also prioritized for fire suppression. See D-FW 1.1.

NGO-WWP-Fite-114: Priority Wildlife Habitat areas have been redefined in the FEIS/RMP.

NGO-WWP-Fite-115: Several factors went into the determination of Priority Wildlife Habitat Areas. As a starting point, and through cooperation with NDOW, the areas that are designated as Population Management Units (PMUs) for the candidate species Greater Sage-grouse were reviewed. Many of these areas are also inhabited by the threatened species Lahontan Cutthroat Trout (LCT). Of these areas, the ones considered to be the most crucial for protection due to presence of at-risk wildlife species habitat, are those proposed as Priority Wildlife habitat areas. The FEIS/RMP preferred alternative clarifies management of these areas to include use restrictions and permit stipulations applicable to certain minerals and rights-of-way proposals in order to protect these areas. See D – FW 1.2, D-SSS 1.2.1 and D-SSS1.2N.

The vast majority of the areas were determined as described above, yet small adjustments were made based on other considerations such as land ownership, habitat fragmentation and areas already under special management or proposed as such (e.g. WSAs, ACECs), For ease in defining and describing the priority area boundaries, section lines were used as much as possible.

NGO-WWP-Fite	Comments	Responses
NGO-WWP-Fite-116	Bighorn Sheep. All Potential Bighorn sheep habitat must be considered for occupancy by bighorns. Domestic sheep grazing within or within 30 miles of bighorn habitat should be phased out.	NGO-WWP-Fite-116: It is an RMP objective to allow for the reintroduction of bighorn sheep in cooperation with NDOW into areas with available suitable habitat. See Objective D-FW 1. Action D-LG-4.1 does not permit livestock class conversions from cattle to sheep in allotments containing historical, existing, or potential big horn sheep habitat.
NGO-WWP-Fite-117	Full and detailed analysis of trailing patterns, too – must be provided and any domestic sheep movement that in any way may conflict with significant bighorn buffer must be ended – example: West side of Granite Range sheep trailing.	NGO-WWP-Fite-117: Livestock trailing is addressed in D-LG 1.15.
NGO-WWP-Fite-118	BLM proposes actions to manipulate habitats for wildlife. Great care must be taken that "farming" public lands for some common species does not destroy critical habitat components for other species – especially species that rely on mature and old growth vegetation communities like the Pygmy Rabbit Loggerhead shrike and others. A primary focus should be on increasing mature and old growth communities, rather than cutting into and manipulating them.	NGO-WWP-Fite-118: BLM addresses old growth forests in VF4. Habitat management for Pygmy rabbits is addressed at SSS 1.3 and SSS 1.3.1.
NGO-WWP-Fite-119	We are very concerned that the RMP's failure to protect playas will adversely affect migrating shorebirds.	NGO-WWP-Fite-119: Protection of shorebird habitat is addressed in D-FW3, 3.1,3.2, and 3.2.1.
NGO-WWP-Fite-120	The breeding season avoidance period for actions in migratory bird habitat should begin in March. Many raptors, as well as lower elevation species begin breeding activities in March.	NGO-WWP-Fite-120: Objective D-FW4 identifies the migratory bird breeding season beginning on March 1.
NGO-WWP-Fite-121	Guzzlers (like livestock water developments) have adverse impacts by providing water for nest predators (like ravens), or expanding the distribution of non-native insects that may compete with native species thus having adverse impacts to pollinators. Plus, do guzzlers serve as breeding habitat for West Nile virus mosquitoes? Habitat should be maintained without artificial water –except in extraordinary circumstances. If domestic sheep grazing were ended in areas of the FO, habitat for bighorn sheep could be significantly expanded – including into areas with more available water – decreasing the pressure for water guzzlers to be built.	NGO-WWP-Fite-121: Management of wildlife guzzlers are addressed at D-FW 6 and D-FW 6.1.
NGO-WWP-Fite-122	Fencing reservoirs will serve to shift and intensify livestock impacts on all non-fenced areas. Reductions in livestock numbers to a controllable level, and application of enforceable stubble height and trampling standards as triggers fro removal of livestock from the pasture or allotment ad active herding must be considered as prudent alternatives to even more barbed wire hazards that will kill or injure Sage Grouse, owls, raptors and other wildlife.	NGO-WWP-Fite-122: BLM has developed a range of alternatives with respect to fencing reservoirs FW 11.2 and LG 5.
NGO-WWP-Fite-123	Please provide an update on meeting goals of the LCT recovery plan.	NGO-WWP-Fite-123: The LCT Recovery Plan is a separate planning document. Actions that address LCT recovery are addressed at D-SSS2, D-SSS 2.1 and D-SSS 2.2.
NGO-WWP-Fite-124	Why is there no provision or focus on springsnail habitat – and restoration of development-damaged springs? Where are all springsnail habitats? What is the status of all populations?	NGO-WWP-Fite-124: Springsnail habitat is addressed in FW 11 and LG 5.3.
NGO-WWP-Fite-125	We are greatly concerned at the low bar of PFC that is being set under Alternatives. There is no assurance that PFC will provide critical aquatic or other habitat components necessary to support viable populations of animals.	NGO-WWP-Fite-125: PFC is one management objective used to maintain and improve riparian and wetland areas. Other objectives and management actions that apply are located in the WRW section. BLM analyzed a reasonable range of alternatives that considered PFC objectives from between 60 to 85% at or moving toward PFC (See Objectives VRW 1). The reasoning behind sliding the PFC percentage down from 100% was to account for reaches not meeting PFC due to uncontrolled disturbance or natural stresses. Action CA-VRW 1.2 includes management of riparian areas to meet standards for rangeland health. BLM established the RMP, PFC objective to 85% taking into consideration the "Riparian-Wetland Initiative for the 1990s." This initiative established a goal to restore and maintain riparian-wetland areas at 75% or more. BLM also considered other factors in developing the PFC objective percentage including uncontrolled disturbance or natural stresses such as soils, gradient, flow, climate etc., that affect PFC. The WD feels the 85% PFC objective is reasonable, complies with the Riparian-Wetland Initiative and takes into consideration of natural stresses or disturbance.
NGO-WWP-Fite-126	Where is any analysis of all existing irrigation reservoirs – and their impacts? What reservoirs could be abandoned/removed – where use is no longer occurring?	NGO-WWP-Fite-126: Removal of reservoirs is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.

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NGO-WWP-Fite

Comments

NGO-WWP-Fite-127

Where are all stock ponds that are disrupting hydrological functions –such as those dug into springs or in draws? Please develop a prioritization and target date for removal of ponds that are causing adverse effects to ecological processes.

NGO-WWP-Fite-128

10% or less trampling of linear banks of streams (and 5% trampling in sensitive channels) will also limit hoof print depressions that serve as breeding sites for West Nile mosquitoes. This should be a trigger for livestock removal, not just measured at the end of a grazing period. Please be sure that meadow areas are included in this measurement requirement as well. We have commonly observed greatly excessive trampling in Soldier Meadows, in the Jackson Mountains, in Goldbanks, in Williams Stock and many other areas –where nearly the entire spring, springbrook or meadow is pocked with cattle hoofprints, and waters grossly polluted with livestock waste. Intermittent and ephemeral reaches must be included in this requirement. It will greatly help to recover riparian vegetation, as well.

We fully support removing access routes that are adversely affecting aquatic habitats.

NGO-WWP-Fite-129

Springs should be "off limits" to further development, and all the springs of the District surveyed to determine which ones could recover surface flows if existing developments were altered or removed. This is critical for Sage Grouse and other wildlife. We are strongly opposed to more fencing - and believe that enforcing measurable standards of trampling and vegetation use as triggers for livestock movement will achieve integrated watershed recovery.

Special Status Species

NGO-WWP-Fite-130

Please provide current baseline information on systematic surveys for sensitive pant and animal species across the District. Winnemucca BLM must conduct surveys – not just rely on the NHP Database. The lack of botanical expertise throughout Nevada BLM is a travesty. Full consideration must be given to the importance of pollinator habitats, and the adverse impacts of livestock trampling, weed invasions and other effects must be fully analyzed.

NGO-WWP-Fite-131

The guidelines proposed for Sage Grouse habitat are insufficient to protect existing Sage Grouse habitats from destruction or degradation. Avoidance and exclusion areas are critical to protecting and recovering habitats and providing for viable populations.

NGO-WWP-Fite-132

Full and detailed current analysis of habitat and population characteristics and conditions must be provided for all Sage Grouse habitats and PMUs. Which populations currently have populations of > 5000 birds? > 1000 birds? > 500 birds? Less than 500 birds? How viable will all populations be under a range of alternatives? What are the movement patterns of all populations – this is necessary to understand habitat protection needs. Please provide detailed mapping of all habitats and leks at the time of the MFP vs. at present. Please provide information on active vs. inactive vs. historic leks, and numbers of birds ad changes through tie associated with each lek that has been tracked.

It is not enough to just protect remaining habitats – but for many of the Sage Grouse populations here – actively restoring weed and livestock-impacted habitats is essential.

NGO-WWP-Fite-133

Avoiding all disturbances during nesting and brood rearing periods, as well as winter, is critical. This especially includes livestock grazing disturbance that promotes predators, and makes nests, birds and chicks vulnerable to predation or other losses. Livestock must be included in NSO provisions, The full

Responses

NGO-WWP-Fite-127: Removal of ponds is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.

Existing range improvements are addressed in Action LG 5.1.

NGO-WWP-Fite-128: the proposed RMP addresses stream bank alteration at D-FW 9.3.1.

NGO-WWP-Fite-129: The RMP addresses this in action FW 9.3.1 and action FW 9.3.2.

NGO-WWP-Fite-130: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-WWP-Fite-131: Specific measures to protect sensitive resources have been included in Appendix B, BMPs and SOPs. Delineation of priority wildlife habitat, priority sage-grouse habitat, and priority watersheds management includes use restrictions which would protect special status species habitat and other important wildlife habitat. See – D-FW 1.2, D-WR1.4, and D-SSS 1.2N. ROW avoidance and exclusion areas are located at LR 5.3 and LR 5.4. See D-SSS 1.2.1.

NGO-WWP-Fite-132: Providing a map of sage-grouse leks could increase their vulnerability. The NDOW is the agency to contact for wildlife population information.

NGO-WWP-Fite-133: The PRMP includes use restrictions within important sage grouse habitat areas – See SSS 1.2.1.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-133 Cont-d

disturbance effects of herding, dogs, salting, degradation of critical habitat components ranging from understory grasses to proactive complex structure of shrubs must be considered.

NGO-WWP-Fite-134

We strongly oppose the "Exceptions, Modifications and Waivers" shown in Alternative D. Politically powerful influences will bend these. This is highly uncertain. Why is there no discussion of the 2004 Conservation Assessment and the 2009 Knick and Connelly et al Sage Grouse Monograph Chapters? There is large amount of mining ad other disturbance in Winnemucca lads, many areas are leased for Oil and Gas, and all manner of "renewable" energy, gas pipelines, and other disturbances are proliferating. Adverse effects of energy and other developments, and threats posed by cheatgrass, disturbances, are examined in these works, and must be incorporated into Winnemucca RMP actions.

NGO-WWP-Fite-135

An avoidance area of a minimum of five miles from Sage Grouse leks must be put in place under the RMP for all new projects. A greater distance may be required for some populations.

NGO-WWP-Fite-136

Full designation of ACEC areas in the Montana Mountains and all other important Sage Grouse habitats is essential. This is necessary to protect remaining habitats and populations from irreparable harms.

NGO-WWP-Fite-137

We strongly support prohibitions on high profile structures but this should be expanded to five miles or greater from leks, and avoidance of all winter habitats, which increasingly tend to be limiting factors. These impacts cannot be mitigated. Protections should be expanded to take into account migratory bird and bat migration or high use area avoidance.

NGO-WWP-Fite-138

Full and detailed information on migratory bird and bat primary migration paths should be identified and displayed o mapping in the RMP.

NGO-WWP-Fite-139

Please adopt similar provisions for fences, and identify fences for removal as part of this RMP effort.

NGO-WWP-Fite-140

We fully support the protections for the Pygmy Rabbit. The avoidance periods should extend to livestock grazing use periods due to adverse impacts of livestock in promoting predators, livestock trampling collapsing burrows especially shallow natal burrows, and other adverse impacts. We are concerned that there are no habitat standards to protect intact mature and old growth sagebrush communities. Maintaining structurally intact and complex dense sagebrush vegetation cover should be maximized for meeting the needs of the Pygmy Rabbit. Vegetation treatments and manipulations should not be allowed to alter or reduce essential Pygmy Rabbit habitats. Mima mounds, patches and inclusions of deeper soils and big sagebrush amid low or black sagebrush communities should be managed to maximize structural integrity and complexity of big sagebrush and protection of understories from trampling. Unfortunately, we often see agencies set use standards based on the short-statured sagebrush often with lots of rocks so it receives much less livestock use - and neglect Land Health standards and use standards for deeper soil big sagebrush inclusions. Yet cattle gravitate toward pockets of deeper soils, greatly degrading them for the Pygmy Rabbit, Sage Grouse Nesting, migratory bird nesting, Sagebrush Voles, etc.

NGO-WWP-Fite-141

It is not sufficient just to survey for Pygmy Rabbits or other animals, if they are found – necessary blocks of habitat must be avoided by projects (including BLM vegetation treatments and development. Habitat fragmentation should be avoided and prohibited. No prescribed fire, sagebrush mowing, hacking or herbiciding should be allowed in or near any occupied or potential Pygmy Rabbit habitats.

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Responses

NGO-WWP-Fite-134: Comment noted.

NGO-WWP-Fite-135: Exceptions, modifications and waivers have been removed in alternative D. Under alternative D, use restrictions would be subject to certain management criteria. The Montana Mountains have been delineated as priority wildlife habitat areas, priority sage-grouse habitat, and priority watershed habitat management. See response NGO-WWP-Fite 131.

NGO-WWP-Fite-136: In May 2005 the BLM initiated public requests for ACEC nominations. At that time a request for public ACEC nominations was mailed to Western Watersheds Project. No proposed nominations were received by BLM as part of the RMP planning process from Western Watersheds Project prior to issuance of the Draft RMP/DEIS. In accordance with BLM ACEC Manual #1613.21 (A)(2)(a), external nominations should be submitted early in the planning process, preferably during issue identification and in comments on issues identified in the Notice of Intent. A timely submission of nominations allows the agency to evaluate each nomination for relevance and importance criteria and to bring forward nominations that meet both relevance and importance into potential alternatives. Proposed ACECs are then subject to a 60 day public administrative review and comment period once the draft RMP is issued.

Based on guidance provided by ACEC Manual #1613, the BLM did not evaluate the Montana Mountains as an ACEC as a timely nomination was not received. The BLM will consider the Montana Mountains as a potential ACEC during the next land use planning cycle. The PRMP/Final EIS identifies the Montana Mountains and other important sage-grouse habitat as priority wildlife habitat areas and priority watershed areas. Management of these proposed areas would protect sage-grouse habitat through no surface disturbance and no surface occupancy use restrictions applicable to fluid minerals, solid minerals leasing, saleable minerals, and rights-of-ways.

NGO-WWP-Fite-137: Lek buffers, migratory birds and bat habitat management are proposed in D-SSS 1.2.3, D-SSS 1.4 and D-FW 4.

NGO-WWP-Fite-138: 16. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-WWP-Fite-139: BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite

	Comments	Responses
NGO-WWP-Fite-142	We are dismayed at yet another "disclaimer"/waiver/loophole provided for protection of resources. BLM only commits to protecting the Pygmy Rabbit if it is a sensitive species. Since BLM Director's can strip status in sensitive List approval, and BLM Director's are political appointees – this wording smells of rank politics. All it will take is Pygmy Rabbit habitat standing in the way of a couple of energy projects, and it is likely these protections could be stripped. Litigation will be brought to bring about ESA Listing of this species. These efforts have no place in Land Use Plans – and only serve to invite political tampering with biological issues. This is clearly already rife in Nevada – following the absurdity of Reno FWS's recent scientifically absurd Finding where it bizarrely claims that cheatgrass, fire, etc. are NOT a concern for the rabbit. Of course, this is due to big energy developer and rancher political pressures – and it will be arbitrary and unwise of Winnemucca BLM to follow in this anti-science political jettisoning of imperiled native biota.	NGO-WWP-Fite-140: New range improvements would require environmental analysis prior to implementation. Existing range improvements are addressed in Action LG 5.1. NGO-WWP-Fite-141: Action D-SSS 1.3 includes implementing mitigation measures to protect Pygmy Rabbit habitat. NGO-WWP-Fite-142: D-SSS 1.2.1 includes revised management criteria.
NGO-WWP-Fite-143	Mining and other actions related to bats should not just be "discouraged", they should be prohibited. There needs to be concrete language – not loose and uncertain meaningless lip service as pervades the RMP in so many places related to natural resources and their protection.	NGO-WWP-Fite-143: The proposed RMP addresses bats at D-SSS-3.
NGO-WWP-Fite-144	It is absurd to allow grazing within exclosures – this is counter to the whole purpose of imposing even more fencing in already greatly fenced landscape. BLM provides no Baseline mapping, fence density analysis, or other information critical to understanding the tremendous impacts if fencing. There is no sound evidence that native species habitat benefits from grazing. The supposed Evans studies on Sheldon were conducted in areas which often had fences – so fences themselves may have been the reason some ungrazed areas were not used by grouse.	NGO-WWP-Fite-144: Refer to action LG 5.6. Grazing would only be allowed consistent with meeting rangeland health standards or other management objectives of the exclosure.
NGO-WWP-Fite-145	It is absurd to think that golden eagle and raptor nest site destruction can be mitigated by providing alternate sites. There is only so much usable habitat out there. Recent studies in Oregon are showing large-scale declines in golden eagle numbers due to industrial wind development – with recent recommendations for a 6 mile avoidance zone for development.	NGO-WWP-Fite-145: Relocation of nests is in compliance with the Bald and Golden Eagle Protection Act. Relocations must also be coordinated with US FWS.
	Wild Horses and Burros	
NGO-WWP-Fite-146	Fencing and other developments that might constrain wild and free roaming horses should be reduced and significantly removed in existing HMAs. Artificial divisions were put in place to separate HMAs – that were then used as justifications for allowing fencing. Example: Colman fence in Soldier Meadows. ALL fences built following passage of the WHB Act should be identified, and a plan for their removal developed here. How many fences are present, and where, in or artificially separating HMAs?	NGO-WWP-Fite-146: Fencing with respect to WH&B management is addressed in WHB 2.
NGO-WWP-Fite-147	Full carrying capacity and suitability analyses must be conducted for all livestock grazing and wild horse HMAs. Horses use terrain very differently than livestock, and can often roam a significant distance (up to 10 miles) from water sources, cover much steeper and more rugged terrain, and otherwise use lands differently.	NGO-WWP-Fite-147: Comment noted
NGO-WWP-Fite-148	Please fully include the Eckels testimony from the Soldier Meadows WWP OHA Hearing in this RMP record. Please let me know if you already have this in the record, or need it to be provided.	NGO-WWP-Fite-148: Comment noted.
NGO-WWP-Fite-149	We have suggested a 1.8 AUMs conversion factor in the case of a Horse Preserve. This should be based on average actual use over the past 2 years. However, full consideration of "paper cow and	NGO-WWP-Fite-149: The BLM researched the suggestion of an 1:1.8 AUM conversion factor for cows to horses on allotments where the permit has been relinquished or cancelled. No research was found supporting this proposal. Any available documentation can be sent to the Winnemucca District Office.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-149 Cont-d.

sheep" AUMs, actual use, a full carrying capacity, and suitability study with conflicts addressed must also be provided in the determining the Suitability of the land.

NGO-WWP-Fite-150

Water developments have significant adverse impacts to wild lands, and since horses can move much greater distances from water than livestock, are often unneeded. In fact, water developments often heighten conflicts by extending livestock areas of heavy to severe impacts, and expanding weeds and habitat degradation. There is already a tremendous ecological Footprint from livestock water developments across Winnemucca lands – which is not analyzed in any valid way in the EIS.

NGO-WWP-Fite-151

OHV racing, harmful energy developments, intrusive low-level aircraft activity, etc. should not be allowed in HMAs. For example, Little Owyhee allotment-HMA ranchers use airplane to herd cows. Isn't this greatly disturbing and displacing wild horses?

NGO-WWP-Fite-152

More humane Gather policies should be put in place – where intact bands remain are kept on the land, as there is evidence that this serves to regulate populations to some extent.

Wildland Fire

NGO-WWP-Fite-153

The only areas where wildland fire should be used are to burn cheatgrass or crested wheatgrass in order to aid in restoration activities that focus on replanting natives.

Cultural Resources

NGO-WWP-Fite-154

BLM must develop and RMP that clearly and firmly prohibits developments such as energy corridors, electric lines, gas pipelines, etc. in TCPs, or other important cultural sites, including viewsheds and landscapes and resources of significance.

NGO-WWP-Fite-155

BLM must set a firm schedule for completing recommendations to the NHP for all currently identified cultural sites.

NGO-WWP-Fite-156

BLM must greatly expand Archaeological protections. "Salvage" in front of the bulldozers is not a protection – it is destruction -but sadly that is what Winnemucca currently allows. Yet unfortunately, the RMP is plagued with the same substanceless and vapid non-protections. See 2-111 "if avoidance is not possible". Avoidance IS always possible – just at times politically unpalatable. This RMP must ensure avoidance.

NGO-WWP-Fite-157

No expansion of any existing project in or near a TCP or other important cultural area should be allowed. All efforts should be made to remove projects - such a s power lines or other energy infrastructure that may intrude in these areas.

NGO-WWP-Fite-158

It is impossible to understand what is meant by "allocated" use.

NGO-WWP-Fite-159

Livestock grazing and facilities often have significant adverse effects to cultural and paleontological materials – yet grazing continues year after year on top of fragile sites –exposing them to harm. We are also greatly concerned that permittee or other maintenance" of range projects may adversely impact cultural sites – as has happened with permittee bulldozing areas in Soldier Meadows. Before any range maintenance occurs, full current clearances and limitations must be out in place.

Responses

NGO-WWP-Fite-150: Water developments are addressed in D-FW 6 and WH&B 3.
NGO-WWP-Fite-151: Action D-WH&B 4.1 includes management actions and permit stipulations applicable to multiple uses within HMAs.

NGO-WWP-Fite-152: Comment noted.

NGO-WWP-Fite-153: BLM provided a range of alternatives relating to managing wildfire to achieve multiple objectives including for resource benefits. Alternatives A and C do not include areas that provide for conditional fire use for a benefit. Action D-VR 4.2 allows for treating cheatgrass areas utilizing prescribed fire.

NGO-WWP-Fite-154: All actions will be done within the context of the National Historic Preservation Act. All alternatives insure this.

The users of a TCP are the only ones who can determine if a project has an adverse effect on the TCP (see National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties). With this in mind, the BLM does consult with the users of the TCP and takes their concerns into account.

NGO-WWP-Fite-155: In accordance with the BLM NSO Cultural Resource Inventory General Guidelines and the State Protocol Agreement between the BLM Nevada and the NSHPO all sites recorded within the APE are evaluated for inclusion in the National Register. Also, Objectives A, B, C, D CR 2 all state that "All currently identified sites and those identified in the future would be evaluated for eligibility for the NRHP."

NGO-WWP-Fite-156: "Salvage in front of the bulldozers" is not practiced by the Winnemucca District. If a National Register eligible site cannot be avoided, a treatment plan is developed and implemented in consultation with NSHPO and, in some cases, the ACHP. This is in compliance with Sec. 106 of NHPA and the State Protocol.

NGO-WWP-Fite-157: Management of areas with TCPs is identified in the Tribal Consultation section of the RMP. Action D-TC2.2 and D-TC 2.4 includes management actions that avoids impacts to sacred sites and TCPs or protects traditional religious practices and sites.

NG0-WWP-Fite-158: Allocation use categories are made in accordance with BLM policy, BLM Manual 8110.4. As described in Actions B, C, &D CR3.2, these include scientific use, conservation use, traditional use, public use, experimental use, and discharged from management. The BLM planning handbook – Appendix C Cultural resources also requires BLM to manage cultural resources based allocated uses identified above.

NG0-WWP-Fite 159: Impacts to cultural resources from grazing are analyzed in site specific NEPA analysis. Range Improvements and maintenance projects are subject to compliance with Sec. 106 NHPA.

NGO-WWP-Fite

Comments

WHY is this section, like all sections of the RMP, written to provide for even more impacts? Why isn't it written to start rolling back intrusions/adverse activities?

Visual Resources

NGO-WWP-Fite-160

An expanded systematic Wilderness-suitable lands inventory must be conducted across the District. All areas found suitable must have VRM 1 status. We have already commented about the Ruby inventories – this must be expanded across the district, and must focus too on high quality lands of less than 5000 acres that have species characteristics and are undeveloped.

NGO-WWP-Fite-161

In the wide open high desert and Great Basin landscape, developments including livestock facilities can have jarring visual impacts over long distances . Ugly shiny metal pipe, tall rock jacks and other developments are often visible over large distances – for example – the Colman Soldier Meadows fence that should be removed – both because it is a visual blight, as well as bisects Wild Horse movement pathways and critical winter and other Sage Grouse and big game habitat. Ugly livestock water troughs surrounded by extensive dead zones of manure and waste are visually intrusive and provide stark and disruptive contrast.

NGO-WWP-Fite-162

Under this RMP, BLM must identify areas of conflict with visual standards, and prioritize intrusions for removal.

NGO-WWP-Fite-163

ACECS should also be managed as VRM 1. This protection often corresponds to the visual setting needs of native species – for example it is increasingly clear that the Sage Grouse avoids intrusive tall objects in the environment.

NGO-WWP-Fite-164

All important Sage Grouse habitats should be managed - at a minimum – as VRM 2, and often times as VRM 1 –depending on lek, winter or other habitat proximity to visual intrusions.

NGO-WWP-Fite-165

Winnemucca lands are already greatly developed in many areas. Areas of blighted viewsheds should be identified. Areas currently unblighted should be identified. VRM protections necessary to limit further visual intrusions in still-intact areas should be provided.

NGO-WWP-Fite-166

ALL developments should be designed to blend into the landscape - both new and existing developments that may need to be retrofitted.

NGO-WWP-Fite-167

Cumulative impacts of visual effects of undertakings must be fully examined. For examined – power lines often result in roads, too. Gas pipelines are marked with ugly bright signs, spawn roading, etc. All of these effects must be examined in analysis, mitigated where possible, and avoided where not able to be mitigated.

Livestock Grazing

NGO-WWP-Fite-168

We are alarmed at the lack of specificity, and overlays of loose, uncertain and risky Adaptive Management in the RMP. BLM fails to provide specific concrete actions that will occur, and that re necessary to prevent further environmental harm, irreversible weed invasions, etc.

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Responses

NGO-WWP-Fite-160: Lands with Wilderness characteristics are addressed in WSA 2.

NGO-WWP-Fite-161: Generally, if structures of the type mentioned are not functional, not of a historical nature or not in place for legitimate uses they may be evaluated for removal. An action of this nature is an implementation level decision, not an RMP level decision.

NGO-WWP-Fite-162: The VRM objectives/classes provide the visual management standards for the planning, design and development of future projects and rehabilitation of existing projects (BLM Manual Handbook H-8400).

NGO-WWP-Fite-163: Special areas (designated Natural Areas, Wilderness Areas, Wilderness Study Areas, Wild & Scenic Rivers, Scenic Areas, Scenic Roads & Trails, and ACECs among others) are but one of the factors to consider when assigning VRM Class ratings.

NGO-WWP-Fite-164: Wildlife concerns/considerations are but one of the factors to consider when assigning VRM Class ratings.

NGO-WWP-Fite-165: A visual resource inventory was completed in 2009.

NGO-WWP-Fite-166: The VRM objectives/classes provide the visual management standards for the planning, design and development of future projects and rehabilitation of existing projects (BLM Manual Handbook H-8400).

NGO-WWP-Fite-167: The VRM objectives/classes provide the visual management standards for the planning, design and development of future projects and rehabilitation of existing projects (BLM Manual Handbook H-8400).

NGO-WWP-Fite-168: Comment noted.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-169

The RMP Objectives, Goals and Actions are woefully deficient in delineating and identifying specific actions to be triggered, as well as sideboards on actions, under any Adaptive Management Scheme. Just plugging in one or another BMP like "salt" or "tack on another fence" is the same failed band-aid approach that BLM has followed with grazing all of these years. Specific failures to met annual and other measurable objectives and triggers for movement/removal of livestock must result in specific and concrete actions – such as 25% reduction in stocking, more protective standards of use, or significant multi-year rest for pastures, and other such actions that will result in a meaningful positive change for the land and biota.

NGO-WWP-Fite-170

In fact, many of the actins – such as salting – that BLM has promoted to address livestock impacts actually expand and intensify harms –by creating severe ones if disturbance in uplands that then serve as centers of cheatgrass and other weed invasions.

NGO-WWP-Fite-171

Unfortunately, the way BLM and this RMP apply adaptive management is basically the "Well, let's try this and see", plus there is no upfront analysis of effectiveness of the hodgepodge of actions that could be imposed. There must be certainty in effectiveness of specific adaptive that are triggered by specific failures or actions. Often BLM has not conducted the rigorous upfront data collection and monitoring to understand how an adaptive action will impact all components of the environment. A classic example is:

Standards weren't met on a stream. So BLM 'adaptively" proposes a stringer fence. The stringer fence causes adverse impacts to sage Grouse and Pygmy Rabbits and viewsheds. Or instead of a fence, so BLM "adaptively" changes to early spring grazing, and disrupts nesting Sage Grouse and migratory birds. Plus cumulative impacts of the laundry list of AM actions can be very significant.

The loose and open-ended way BLM has been applying adaptive management is fraught with environmental peril. Plus the laundry list of possible actions are typically just BMPs that often have not been effective in the past. BLM time and again has shifted and altered us and ended up causing more conflicts with other resources uses.

NGO-WWP-Fite-172

This RMPDEIS is based on limited and at many times outdated information on the current status of natural resources - including basic ESI and other vital data on plant community condition and production -cannot provide a basis for applying Adaptive management. There is no Baseline of fence densities location of fences, or other factors at present. Yet under its uncertain AM scheme, BLM seeks to impose more and more disturbance zones or developments. We again stress that instead of more and more development on lands that face invasive species, climate change adversely impacting ecosystems, significant habitat fragmentation and looming energy development threats – removing intensive livestock management facilities and activities, limiting salting sites, etc. is needed to provide a modicum of sustainability under all alternatives. This is also necessary to comply with conservation needs for rare and imperiled species.

NGO-WWP-Fite-173

On lands Open to Grazing use: Application of conservative measurable standards of grazing use must be the basis for controlling livestock use in areas to be grazed. 10% or less of upland grass utilization is necessary to provide 7-9" of grass cover for Sage Grouse nesting. 5% or less of trampling of accessible banks, 10 or less riparian browse, and 6 inch stubble height should be applied to riparian areas - with these use standards as triggers for removal of livestock. Shrub breakage/nipping standards should also

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Responses

NGO-WWP-Fite-169: See LG Section and SOPs/BMPs for livestock grazing in Appendix B.

NGO-WWP-Fite-170: See LG Section and SOPs/BMPs for livestock grazing in Appendix B.

NGO-WWP-Fite-171: Comment noted.

NGO-WWP-Fite-172: BLM considers information provided in the AMS as relevant. The AMS described current management, trends and forecasts by resource. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. The proposed RMP was updated in many areas with additional data and information. See response NGO-WWP-Fite 104.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-173: Refer to Adaptive Management objective LG 1.2.

NGO-WWP-Fite	Comments	Responses
NGO-WWP-Fite-173 Cont-d.	be provided to protect shrub structure and the habitat components be provided. They should not be measured at the end of the grazing period – but instead during the period, and be a trigger for removal.	
NGO-WWP-Fite-174	A carrying capacity and Capability and Suitability Determination must be conducted as part of this RMP process to determine the basis for any livestock allocation, and to determine which lands should be Open to livestock use, as well as the Class of livestock use in any Open lands. This must take into consideration slope, distance from water, soils/desertification, production of sustainable perennial forage, and other factors. Suitability must be determined on the basis of significant conflicts with Sage Grouse, Pygmy Rabbit, Bighorn Sheep or other wildlife, or rare aquatic species or imperiled plants or plant community concerns.	NGO-WWP-Fite-174: Comment noted.
NGO-WWP-Fite-175	We never expect that BLM will actually choose the No Grazing. Here BLM fails to adequately evaluate the significant benefits of No Grazing using current science. A full evaluation is needed to understand the degree and severity of effects of other alternatives, as well to aid in understanding a range of reduced grazing alternatives that need to be examined. These reduced grazing alternatives must focus on removing grazing from lands found to not be Capable or Suitable, and/or where significant conflicts exist. Alternatives must also focus on significant reductions in stocking rates below the average actual use that has occurred over the past 20 years (since the MFP) of 25, 50 and 75% in lands that may continue to be grazed.	NGO-WWP-Fite-175: BLM developed a range of alternatives that included a no grazing option and analysis.
NGO-WWP-Fite-176	Jon Marvel of WWP has e-mailed Mr. Edwards grazing permit retirement language for incorporation in this EMP effort under all action alternatives. Grazing permit retirement should be part of mining or other development mitigation. This is especially the case since mines and big developers typically end up buying private lands, waters, and associated grazing permits.	NGO-WWP-Fite-176: The PRMP includes relinquishment of grazing permits at D-LG 1.9.
NGO-WWP-Fite-177	The economic analysis must fully take into account that many of the Winnemucca permittees are actually now mines, developers/speculators, and hobby ranchers or other non-"traditional" ranching entities - and where running livestock is often a significant financial cost to the permit owner.	NGO-WWP-Fite-177: See response to comment N-WWP-97. Detailed accounting of individual permits held on public lands is outside the scope of this RMP analysis. Volume 5, Appendix H contains a summary data at the appropriate level of detail required for a programmatic analysis of socioeconomic effects across a broad planning area for all resource programs administered by the agency. See Appendix H, pages 2-35 through 2-40 for a discussion of livestock grazing administration. The PRMP reflects an updated social and economic section in Chapter 3.
NGO-WWP-Fite-178	Please identify all permits held by mines, developers or other "non-traditional" ranchers in this area.	NGO-WWP-Fite-178: Outside scope of analysis.
NGO-WWP-Fite-179	The economic analysis must also take into full account the tremendous financial costs to the public of public lands livestock grazing – not just the below market fees, predator killing, weed spraying, and the costs to administer permits – but also the costs in recreational uses lost or foregone, wildlife habitats altered or choked with weeds, streams dried up, bighorns sickened and dead due to diseases of domestic sheep, etc.	NGO-WWP-Fite-179: See response to comments N-WWP-97 and N-WWP-Fite-177
NGO-WWP-Fite-180	Table 2, at121-123 shows the absurdity of the EIS's development of alternatives and analysis of grazing. Eight million and some acres open to grazing under all alternatives except No Grazing. 399-398,000 AUMs under all alternatives except No Grazing.	NGO-WWP-Fite-180: BLM has developed a range of alternatives.
NGO-WWP-Fite-181	Wild horses and burros should be given priority in forage over livestock in HMAs. They are a non-commodity use of public lands, valued by a large number of the American people.	NGO-WWP-Fite-181: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established her management areas (HMAs) and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. Specific HMA AUM allocation decisions are addressed at the site specific or HMA level.
NGO-WWP-Fite-182	The provisions for monitoring data lack required mandatory collection provisions on an annual or other basis, and lack requirements for effective action in a timely manner (before the start of the next grazing episode).	NGO-WWP-Fite-182: BLM policy (handbooks, manuals, instruction memorandums, and information bulletins) directs monitoring.

NGO-WWP-Fite	Comments	Responses
NGO-WWP-Fite-183	We fully support removal of incompatible range projects – and this RMP must establish Resource conflict criteria to identify these.	NGO-WWP-Fite-183: Removal of range improvements is addressed at D-LG5.1.
NGO-WWP-Fite-184	Forage banks are a very bad idea. This leads to the ultimate "Tragedy of the Commons" – where a rancher can beat up lands to an extreme degree – yet be given other places to graze.	NGO-WWP-Fite-184: The PRMP allows for forage banks subject to t certain criteria. See D-LG 1.9.2.
NGO-WWP-Fite-185	TNR should not be allowed on Winnemucca lands. This RMP has not identified lands where "ephemeral" forage exists. We have seen BLM repeatedly allow TNR – resulting in ranchers "saving" lands where they seek TNR while shifting and intensifying impacts on areas including native communities where TNR is not allowed or requested. This also creates overstocking, and causes ranchers to build up herds to unsustainable levels for the lands. TNR issuance is also fraught with political interference – as powerful ranchers may use politicians to help them get TNR. TNR and intensive grazing is not a solution to "fuels" concerns. In years with little rain, areas are turned into a dustbowl, ecological functions further altered, and sites primed for even more weed invasions and big fires.	NGO-WWP-Fite-185: TNR is addressed in D-LG 1.11 which includes criteria to protect resources or habitat.
NGO-WWP-Fite-186	There is no current ESI or other equivalent info to enable understanding of carrying capacity or levels of sustainable use.	NGO-WWP-Fite-186: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.
NGO-WWP-Fite-187	We are concerned about "cooperative agreements" – as ranchers have already tried to use these to claim title to range project s under the failed Bush Grazing regulation changes. It is critical that BLM exercise control and scrutiny over how any existing projects are dealt with.	NGO-WWP-Fite-187: Cooperative agreements are specifically identified in section 43 CFR 4120.3-2 in the grazing regulations as the mechanism to assign maintenance and authorize construction of range improvements.
NGO-WWP-Fite-188	There is no evidence that three or two or any grazing during the critical growing period is not harmful to native vegetation communities. It is absurd for BLM to try to promote the "Staff" recommendations as really doing anything positive here. EIS at 2-133.	NGO-WWP-Fite-188: Critical growth period is addressed in LG 1-12
NGO-WWP-Fite-189	Why does this RMP address a few allotment boundaries – but not others? Are some of these areas lands that have been recently acquired? If so, they should be kept free of all livestock grazing use, and excluded from allotments. All these parcels/areas should be Closed.	NGO-WWP-Fite-189: Adjustments, moving or changing allotment boundaries must be completed through the LUP process. Some allotment boundaries were modified to improve management in certain situations. See D-LG 3.1.1.
NGO-WWP-Fite-190	Conversion from sheep to cattle, or closure to use, should occur on all allotments that contain potential bighorn habitat under the RMP. Any conversion should occur at a rate much less than 5 sheep to 1 cow due to the great difference in how sheep use steeper or rockier country than cattle. A full carrying capacity and capability/suitability study must be conducted.	NGO-WWP-Fite-190: Conversion from cattle to sheep is addressed at D-LG 4.1.
NGO-WWP-Fite-191	Please review our Scoping and other comments related to springs and developments. All developed springs and undeveloped springs must be identified, mapped and surveyed as part of the FLPMA-required current inventory of lands. This is necessary to understand the relative scarcity of undeveloped natural springs, springsnail habitat impacts, and other concerns. Where has springsnail habitat been impacted by development?	NGO-WWP-Fite-191: Comment noted.

Salable Minerals

NGO-WWP-Fite

Comments

NGO-WWP-Fite-192

Areas of remaining native vegetation communities, important habitats, important viewsheds, or cultural areas should be placed off-limits to all salable minerals. The landscape is already pocked with gravel and other materials pits.

Fluid Minerals

NGO-WWP-Fite-193

Large areas of salt desert shrub, playa and sagebrush communities must be placed off-limits to oil-gas and geothermal explo and development.

NGO-WWP-Fite-194

Five mile and often greater avoidance distances must be provided for all sage Grouse leks and important habitats. No large intact blocks of native shrub habitats should be open to fluid minerals intrusions.

NGO-WWP-Fite-195

A full and adequate Baseline of current leases/development- and foreseeable lease/development effects must be provided. How would large-scale geothermal leasing affect the viability of Sage Grouse, Pygmy Rabbit, Loggerhead Shrike and other rare and important species? How will it affect ground and surface waters?

NGO-WWP-Fite-196

Serious adverse effects have been found from explosives and other methods uses in geothermal drilling in California and other areas – mini-quakes have been caused. Now we learn that potential fracing and other chemicals and explosives may be used to permanently alter and pollute underground waters – with adverse effects to ground and surface waters, with adverse effects to humans, cultural values, sage Grouse brood rearing, aquatic biota, and many other animals that rely on waters on public lands.

NGO-WWP-Fite-197

Geothermal activity should only be allowed in already disturbed areas, and close to existing infrastructure. Facilities require powerlines, improved roading, and all manner of other disturbance. The existing baseline Footprint of powerlines and other facilities is not provided in the RMP. It must be, and responsible siting and planning be developed.

Nevada desperately needs comprehensive up-front "renewables" and other energy planning. This has not occurred, and what we are seeing happen, and what this plan helps promote, is reckless renewables and energy sprawl that is eating up and further degrading, fragmenting and destroying remaining intact habitats and landscapes. This planning must be done for energy corridors – for transmission lines, gas pipelines, etc. and these projects must be prohibited in intact native vegetation communities

NGO-WWP-Fite-198

This RMP must take firm action to exclude development in remaining native vegetation areas, or areas distant from infrastructure. Where are all mining and other "brownfields" or cheatgrass sites where energy projects could be located with a much-reduced impact adverse Footprint. These suitable sites must be identified in the RMP, and geothermal, wind or any solar or other destructive industrial facilities placed in those locations. A much-expanded acreage of ACECs must be protected from any energy development intrusion.

NGO-WWP-Fite-199

No mineral leases should be offered within five miles of a WSA, and full studies of connections between affected ground and surface waters, viewsheds, habitat impacts, must be studied in advance of any lease – including full consideration of all direct, indirect and cumulative effects.

Responses

NGO-WWP-Fite-192: The PRMP includes use restrictions applicable to saleable and fluid minerals within priority wildlife habitat areas (D-FW 1.2), priority sage -grouse areas (D-SSS 1.2.1), priority watersheds (D-WR 1.2) and within ACECs (D-ACEC 1.2). Many of these areas contain important habitats and cultural values.

NGO-WWP-Fite-193: See response to NGO-WWP Fite-192.

NGO-WWP-Fite-194: Priority wildlife habitat, priority sage-grouse habitat and priority watersheds have been revisited in the FEIS/RMP. These areas contain fluid mineral use restrictions which protect sage-grouse habitat, including leks.

NGO-WWP-Fite-195: Baseline data was provided in the Mineral Assessment Report prepared for the RMP, available for review at the Winnemucca District office.

NGO-WWP-Fite-196: Blasting would be analyzed as part of site specific geothermal permitting process.

NGO-WWP-Fite-197: The RMP adopts Best Management Practices for Geothermal exploration and development to reduce impacts. Delineation of priority wildlife habitat, priority sage-grouse habitat, and priority watersheds applies no surface disturbance, no surface occupancy applicable to fluid minerals.

NGO-WWP-Fite-198: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data. Affects from geothermal leasing would be analyzed on a site-specific basis. All Renewable Energy Plans of Developments are required to be reviewed under NEPA, a public process.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1 (b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-Fite-199: See response to NGO-WWP Fite-192. Four ACECs are being brought forward in the PRMP.- See D-ACEC 1 and D-ACEC 1.1.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-200

It is impossible to understand why the "Staff" alternative for leasing differs so greatly from alt. C (see 2-165). Areas closed to leasing must be maximized.

Locatable Minerals

NGO-WWP-Fite-201

BLM must specify in detail what it means by maximizing protection of resources. There is no adequate current Baseline provided of the Footprint of existing mining and explo activity, and claims.

NGO-WWP-Fite-202

Large Sage Grouse Pygmy Rabbit and Salt Desert Shrub ACECs should be withdrawn from mineral entry. This is critical since the impacts of mining to the environment are already so great in Winnemucca and adjacent BLM lands, and sagebrush and other species have been so greatly affected by grazing, weeds, fires, and other development already. Many Sage Grouse PMUs in Winnemucca lands are small islands, or suffering from many overlapping threats. Imposing large-scale mining with aquifer drawdown, and greatly increased human disturbances including roading and noise may cause populations to sink even lower. Please carefully review the Knick and Connelly (2010) sage Grouse Monograph Chapter by Garton and others that shows how unviable many populations currently are.

As before, five miles or greater, depending on the population characteristics, is required for Sage Grouse lek and other habitat avoidance.

NGO-WWP-Fite-203

Mitigation for developments should include grazing permit retirement to alleviate stressors on waters, watersheds and habitats.

Recreation

NGO-WWP-Fite-204

A fuller analysis of recreation provisions of the RMP ad their impacts sensitive and rare species, as well as soil stability and reductions in dust must be provided.

NGO-WWP-Fite-205

Again, a new and expanded WSA/wilderness-suitable lands inventory analysis must occur.

NGO-WWP-Fite-206

We are concerned at provisions for private parties to develop recreational visitor facilities in the Granite Range, or anywhere else.

NGO-WWP-Fite-207

We are concerned about damage to playa and dune habitats, including activities that disturb soil surfaces promoting weeds and wind-blown dust.

NGO-WWP-Fite-208

Seasonal closures to motorized use are important in critical habitat areas for Sage Grouse and other species. Examples: Leks, Wintering habitat. Also to bighorn sheep lambing and winter habitat.

Transportation and Travel

NGO-WWP-Fite-209

The role of livestock facilities in a proliferation of roading must be fully identified, and roads identified for closure that developed in a sprawling pattern in relation to facilities. Examples: BLM prepares EA for a fence. No road is analyzed in a fence – yet a road was driven in along the fence.

NGO-WWP-Fite-210

Please identify all such new roading since the MFP as a baseline here. What is the current density of raiding in all habitat areas, and how can it be reduced? Examples: The Priority 1 and 2 habitats.

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Responses

NGO-WWP-Fite-200: Comment noted.

NGO-WWP-Fite-201: Baseline data was provided in the Mineral Assessment Report prepared for the RMP, available for review at the Winnemucca District office.

NGO-WWP-Fite-202: Mineral withdrawals are addressed at D-MR 9.2. D-MR 9.3.1 requires additional stipulations to protect or mitigate impacts to resource values.

NGO-WWP-Fite-203: See LG 1.9.

NGO-WWP-Fite-204: Chapter 4 - Environmental Consequences – analyzed impact of recreation to various resources.

NGO-WWP-Fite-205: Lands with Wilderness Characteristics are defined and addressed at D-WSA 1.2 .

NGO-WWP-Fite-206: Maintaining, improving and protecting dune habitats are addressed at D-FW 3, which includes shorebird and waterfowl habitats.

NGO-WWP-Fite-207: Seasonal restrictions with respect to sensitive species is addressed at D-SSS 1.1.

NGO-WWP-Fite-208: A Comprehensive Transportation & Travel Management Plan will address these concerns for OHV management after the ROD for the RMP is signed. A SOP has been added to Appendix B that addresses seasonal closures for wildlife concerns.

NGO-WWP-Fite-209: Comment relates to site specific NEPA. BLM complies with NEPA prior to implementation of fencing projects generating a federal action.

NGO-WWP-Fite-210: Road densities and locations is addressed at D-TA-4. Closing or relocating roads to protect sensitive wildlife habitats or achieve appropriate road densities are addressed at D-TA 4.1.

NGO-WWP-Fite

Comments

NGO-WWP-Fite-211

BLM must act to limit the wide balding of roads, destruction of vegetation, and bare soil weed corridors along its roadways. Often weeds move along County-bladed roads, then livestock spread them crosscountry.

Lands and Realty

NGO-WWP-Fite-212

BLM identifies far too much land for disposal. This is an outrageous amount. There should be no net loss of public land under this RMP. Efforts should be made to block up land in some areas, with retention of native vegetation area given high priority.

There is not sufficient baseline botanical or other current info in this RMP for BLM to have any idea how much land may or may not be suitable for disposal.

NGO-WWP-Fite-213

Large blocks of intact habitats should be identified as off-limits to any right-of-way grants. Strategic upfront planning that excludes transmission gas and other lines from important areas must occur. Zoning to site projects in brownfields sites, along the I-80 corridor, or other such areas must be done as part of this RMP.

Powerlines should be buried where at all possible.

ACECs

NGO-WWP-Fite-214

See WWP previous comments related to Nachlinger et al., Sage Grouse and other important ACECs. All areas identified as Priority 1 and 2 habitats must be fully considered as ACECs.

Misc.

NGO-WWP-Fite-215

What percentage of cheatgrass was used in mapping Figure 3-22? This map is 2007, and already outdated. Where is cheatgrass present in understories – and at what percentage?

NGO-WWP-Fite-216

Where are lands "at risk" – these must be identified, and protections applied.

NGO-WWP-Fite-217

There are many areas of "high value habitat" – for example lands near Sheldon – that are wrongly mapped in Figure 3-22.

NGO-WWP-Fite-218

A minimum period of 10 years rest must be provided following any wildfire or vegetation treatment to enable recovery of native vegetation.

NGO-WWP-Fite-219

Only native ecotypes should be used for post-fire seedings or in any restoration projects.

NGO-WWP-Fite-220

We are concerns that "stewardship monitoring teams" may not hold ranchers to actually meeting standards. BLM must maintain systematic independent monitoring schedules and trained staff to do this, and periodically monitor lands on definite schedules.

Responses

NGO-WWP-Fite-211: A number of Standard Operating Procedures address weeds with respect to road maintenance. Control measures for weeds and invasive species have been provided in Appendix B Vegetation -Weeds

NGO-WWP-Fite-212: The RMP designates lands proposed suitable for disposal. All disposals must meet requirements of FLPMA, disposal criteria listed in the RMP, and includes NEPA analysis. See D-LR 3.1. All disposals must comply with FLMPA. Also see Alternative C-LR 3.1

NGO-WWP-Fite-213: Rights of way avoidance are identified at D-LR 5.3. Exclusion areas are identified at D-LR 5.4. Also see figures 2-60 and 2-62 in appendix A.

NGO-WWP-Fite-214: Refer to Appendix F, which depicts the ACEC process, including public nominations. Four ACECs are being brought forward in the PRMP.

NGO-WWP-Fite-215: Figure 3-11, Chapter 3 was updated showing invasive annual grasslands. Table 3-10 lists plant communities and acreages.

NGO-WWP-Fite-216: Current populations of invasive plant species are shown in Figure 3-9 and historical occurrences of weed infestations are shown in Figure 3-10. Other future locations could occur based on surface disturbance activities, the exact locations are difficult to predict. The associated impacts of invasive species are addressed in each project level NEPA analysis. This analysis includes requirements to use of BMPs, SOPs, and other mitigation measures to control or limit the spread of invasive species.

NGO-WWP-Fite-217: FMU types were determined in the Fire Management Plan (2004). This plan is due for revision after the RMP is complete.

NGO-WWP-Fite-218: BLM developed a range of alternatives. VR 3.1

NGO-WWP-Fite-219: The BLM has developed a range of alternatives - VR 4.1

NGO-WWP-Fite	Comments	Responses
	Climate change and invasive species are two of the greatest threats to biodiversity and the ecosystems Combined their impacts are compounded, potentially resulting in negative feedback loops with increasingly dire consequences. Sincerely, Katie Fite Biodiversity Director Western Watersheds Project PO Box 2863 Boise, ID 83701 208-429-1679	NGO-WWP-Fite-220: Monitoring of livestock grazing is provided at D-LG 1.5. This action includes opportunities to monitor with interested publics.

NGO-WWP

Comments

Responses

Katie Fite <katie@westernwatersheds.org>

09/25/2010 08:23 AM

To <lisa_ross@blm.gov>, <robert_edwards@blm.gov>
cc
Subject Winnemucca RMP

September 24, 2010

Mr. Robert Edwards
Ms. Lisa Ross
Winnemucca BLM
5100 East Winnemucca Blvd.
Winnemucca, NV 89445

RE: Winnemucca RMP DEIS

Dear BLM,

Here are initial comments by Western Watersheds Project on the Winnemucca RMP effort. We have been informed that BLM will accept comments until October 25, thus providing a one month extension. We will be submitting additional comments then but wanted to be sure to submit theses initial comments now.

NGO-WWP-1 The Analysis of the Management Situation on which this DEIS is largely based is:

1) Outdated. Most info is from 2005 or earlier.

NG-WWP-2 2 Extremely limited in its consideration of current ecological science related to many important elements. This includes microbiotic crusts, current ecological condition of plant communities and habitats, invasive species, adverse effects of chronic livestock grazing disturbance, climate change issues and effects.

NGO-WWP-3 3 Lacks Sufficient Baseline information to base a valid RMP effort and alternatives on. The AMS (and limited "new" info used in the RMP) fail to provide an adequate Baseline of many components of the environment. This current Baseline info is essential for the RMP to be a current inventory of the public lands, as required under FLPMA. For example, there is no systematic current Ecological Site Inventory so that a full understanding of the basis for any claims of current or future sustainability or allocations for grazing or other uses can be based. The last ESI was likely 20 or more years ago.

NGO-WWP-Fite-1: BLM considers information provided in the AMS as relevant. The AMS described current management, trends and forecasts by resource. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. The FEIS/RMP has been updated to reflect current data and additional information.

NGO-WWP-Fite-2: BLM considers information provided in the AMS as relevant. The AMS described current management, trends and forecasts by resource. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values.

NGO-WWP-Fite-3: The BLM analyzed existing inventory data and other information in the development of the AMS. The AMS considered indicators, current conditions, trends, forecast, and key features. Existing data was utilized to support these sections. There are no cumulative effects analysis in the AMS. The DEIS analyzed cumulative impacts based on a range of reasonable alternatives.

The BLM has prepared a DEIS that analyzes four alternatives with one alternative having a "no grazing" option. (Option 2).

NGO-WWP

Comments

NGO-WWP-4 There is no systematic Baseline inventory for a wide array of rare and declining native biota – sensitive species, and federal candidate species in particular. There is no analysis of the current status of animal and plant populations (like Sage Grouse, Pygmy Rabbit, Loggerhead Shrike, Yellow-Breasted Chat, Pinyon Jay, Ferruginous Hawk), or their viability over the short, mid and long term.

NGO-WWP-5 These deficiencies remain uncorrected in the DEIS. Much more current and adequate information must be collected. As it stands, the EIS continues the Manifest Destiny mindset – that there are endless acres of public lad that can continue to be sacrificed to all manner of economic uses. The RMP focuses primarily on short-term economic gain for a hand full of interests – at the expense of all other values of the public lands. It fails to adequately recognize that many uses are no longer able to occur – if there is to be anything remaining for wildlife and other native biota, and water and watersheds, on the public lands.

An RMP written in 2010 must fully reckon with the limits to "resource" exploitation, and the increasingly NON-renewable toll that grazing and other chronic disturbances impose on native ecosystems. The days of Manifest Destiny are over.

Adequate Current Inventory Lacking

NGO-WWP-6 The DEIS fails to provide a current inventory of the public lands based on current ecological science; Failing to base analysis and decisionmaking on current ecological science – instead is buried in the worst of the Nevada Ag. Extension livestock industry range myths, forsaking

Responses

NGO-WWP-4: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-WWP-5: BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures. The PRMP proposes management of priority wildlife habitat areas and priority watersheds to include use restrictions to protect wildlife habitat and watersheds.

Attachment documents were reviewed and considered by BLM; however, it is not included in this Appendix. To view these documents contact the Winnemucca District Office at 775-623-1500, or via e-mail at wfoweb@blm.gov.

NGO-WWP-6: See response NGO-WWP-5

NGO-WWP

Comments

ecological science

NGO-WWP-7 Many provisions of the RMP Alternatives provide overwhelming emphasis on economic interests at the expense of all other values of the public lands. Many provisions embraced by the RMP will result in further extirpations and extinction of native biota or animals that the public values, like wild horses. BLM sweeps under the rug the severe ongoing effects of livestock grazing, and the calamitous effects of the severe habitat loss, fragmentation and degradation that has occurred/is occurring.

Issue Identification Concerns

NGO-WWP-8 The EIS Issue identification has not provided sufficient info and analysis to understand that scientific framework and analysis on how any threshold was defined/identified, how substantial change is defined, what level of controversy is acceptable and how prudent management of resources is required despite high degrees of controversy, what exactly is meant be a wide range of opportunities, would cause disagreement over impacts. Under this kind of system – it appears that if ranchers object to changes in grazing, or for example disagree about scientifically proven domestic sheep transmission of diseases to bighorn sheep, issues might not be included –or BLM will just perpetuate the status quo and allow domestic sheep to inundate potential bighorn habitat. Is this correct?

NGO-WWP-9 BLM can not rely on a 2005 Scoping Report to address issues on 2010. For example, the issue of livestock-facilitated desertification and weed invasions were not as well known in 2005 to feed into and amplify adverse climate change effects. Now they are. See Steinfeld et al. (2006). This information should be a driving force in all of a reasonable range of alternatives. Instead, we see an EIS that has several alternatives that ignore current science.

Purpose and Need

NGO-WWP-10 ES-3 states that this is being prepared to provide new info and data. In order to fulfill this, current ecological science, and understanding the dire current straits of important sagebrush, salt desert shrub and other habitats due to the adverse effects of the many heavy disturbances BLM seeks to impose is critical. BLM must determine how dire the situation is to develop a proper RMP.

While this section mentions new management direction, it is very vague, and it is unclear what if any of this direction is, and how science affects that direction.

The P&N section provides no real basis for developing a reasonable range of alternatives.

Management Alternatives

NGO-WWP-11 The EIS states that alternatives must provide a mix. What we often see – and here too – is that alternatives themselves are very mixed/blended just so the agency can say there is a mix, and alternatives often include "poison pills". Or they are made to be just enough "different' for the sake of having some kind of a range – that they do not provide a comprehensive and coherent

Responses

NGO-WWP-7:BLM has complied with 43 CFR 1610.4-1 issue identification and Council of Environmental Quality Regulations 40 CFR §1500.4 (d) and §1507. Through RMP scoping, relevant issues were identified and they remain relevant.

NGO-WWP-8: BLM has complied with requirements for identification of issues according to Code of Federal Regulations at: §43 CFR 1610.4 -1 and the National Environmental Policy Act at: §40 CFR 1501.7 Although a number of years have passed since initial scoping of the RMP, BLM has determined that the planning issues identified remain relevant. The Draft RMP/EIS (DEIS) has been updated to address changes in laws, regulations and policy that have occurred since initial scoping. Based on public comments received on the DEIS, any new emerging issues have been addressed in the FEIS/RMP.

NGO-WWP-9: The Scoping report and AMS remain relevant. Management actions related to livestock grazing and weeds were included in the DEIS. Climate change has been revisited in the FEIS/RMP.

NGO-WWP-10: The purpose of the RMP ties into BLMs mandate and requirements under FLPMA. The need is because regulatory and resource conditions have changed as well as public demands and uses. The alternatives are developed from the purpose and need, issue identification, public scoping and comments received.

A range of alternatives were provided for management of sagebrush and salt desert shrub - See VR6 and VR8.

BLM through FLPMA is mandated to manage public lands for multiple uses some of which cause disturbance.

NGO-WWP-11: The alternatives were developed based on the Analysis of Management Situation, purpose and need, issue identification, and comments received from public scoping. Cooperating agencies, Tribal governments and the RAC subgroup also assisted with this process.

NGO-WWP

Comments

NGO-WWP-11 Cont-d.

framework for managing public lands based on current science and needs.

This section also mentions development – but says nothing about removing existing developments. Some of the Winnemucca lands are already developed to death. A series of alternatives should be developed that focus on lessening the impact of economic and other uses, rather than increasing them. This would emphasize fence removal, water project removal, road closures, and retention and recovery of large blocks of less trammeled lands – to aid in buffering lands from climate change effects, and to ensure sustainability of resources (water, native vegetation, wildlife habitats and populations).

NGO-WWP-12

Alternative A is Baseline for Management. But what is the FLPMA-required current inventory Environmental Baseline under this Alternative, and as the basis for all others? It is lacking in just about every way.

NGO-WWP-13

How have conditions changed under the management of Alternative A since the old MFP was adopted? For example, if livestock stocking was 100,000 AUMs in the 1980s (days of the old MFP and Grazing EIS's), and all the adverse ecological changes that have occurred in many areas have occurred under grazing at that level, how can that info be used to inform development of what really is a "reasonable" range of science-based alternatives?

NGO-WWP-14

Alternative B "emphasizes resource use". But there is not sufficient baseline data, or full and fair consideration of current ecological science, to determine what level, if any, of "use" that the particular resource can tolerate. If a particular resource is in dire straits, or facing chronic disturbance impacts whose adverse effects are amplified by climate change, it is quite likely that only minimal levels of use could in any way, shape, or form be considered sustainable, or could result in BLM complying with its conservation plans for Sage Grouse and other rare species.

NGO-WWP-15

What baseline data and assumptions were used in formulating this and all other alternatives? How were changing climate effects, weed invasion and expanding dominance following disturbance – including from livestock grazing, and other uses, levels of desertification and depletion, loss or reduction in surface water flows, impacts of existing mining (such as ground water depletion), status of already degraded and fragmented habitat and declining populations of rare and imperiled biota, public's increased use of Open Space, and other factors outlined, analyzed qualitatively and quantitatively, and incorporated into alternatives and their development?

NGO-WWW-15

The whole Fire Condition Class scheme is largely irrelevant to really managing public lands. It has little to nothing to do with arid lands habitat –except in promoting REDUCTIONS in habitat, and further losses and fragmentation for important, sensitive and rare species that typically rely on mature and old growth communities that projects applying the FRCC tend to reduce or destroy.

NGO-WWW-16

FRCC was derived largely for mid to high elevation forested communities in the Northwest and Northern Rockies, which are largely absent in the district. It appears to be being used in current bLM Land Use Plans primarily as a mechanism for getting fire funds.

Responses

NGO-WWP-12: BLM is mandated by FLPMA Sec. 102(7) to manage public lands based on multiple use and sustained yield. FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

Alternative C emphasizes management strategies to preserve and protect ecosystem health. A range of alternatives addressing removal of range improvements are found under Livestock Grazing section LG 5.1 and WH&B management WHB 2.2 Alternatives C & D.

NGO-WWP-13: See response to NGO-WWP-12. Analysis of the Management Situation (April 2005) and Chapter 3 discloses conditions and current management conditions since the adoption of the MFPs. Alternative A was developed using existing available data.

NGO-WWP-14: The AMS identifies how issues and conditions have changed. The old MFPs did not adequately address a number of issues including but not limited to: OHV travel management, mine reclamations, and ACECs. Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

NGO-WWP-15: See response to NGO-WWP-12.

NGO-WWP

Comments

NGO-WWP-16 Cont-d.

Instead, **we suggest a foundation of all alternatives should be ways to maximize retention of native vegetation communities, microbiotic crusts, and large intact blocks of habitat with minimal weeds - especially old growth and mature communities.** Managing for intact microbiotic crusts also helps to prevent the spread of invasive species.

FRCC is also aimed at killing, reducing and removing the very species sagebrush and trees that are the anchor plants for preventing weed expansions. This is often done in highly invasive ways –maximizing likelihood of cheatgrass and other weed invasions.

We are greatly concerned at the large area where BLM proposes fire for "resource benefit" under this Alt. There is great danger that any fire in the few higher elevation areas "sky island" type lands could move into sensitive communities. Especially since these areas are largely mountain tops – a fire could quickly spread.

In addition, there is a tremendous effort being made in Nevada to destroy critically important pinyon-juniper communities and old and mature sagebrush communities as well through mowing that spawns cheatgrass. This was the basis of much of the Ely RMP – where 2/3 or more of the vegetation communities are proposed to be reduced, altered, or manipulated – with a likely outcome of extirpation or extinction of dependent species from large areas. Large-scale habitat destruction and loss is occurring in old and mature sagebrush communities, as well as in sites that are historically pinyon juniper communities. In their place, BLM is getting weeds, cheatgrass and bare dirt and some scraggly bunchgrass. Sadly, Winnemucca BLM is currently undertaking just such weed-spawning projects in the Montana Mountains and other areas. These destructive projects increase fire risk through promoting flammable weeds.

NGO-WWP-17

This is part of the cumulative effects analysis that BLM must conduct. How much habitat remains across both the district, and region – and how foreseeable are large-scale losses from wildfire, as well as purposeful manipulation.

The series of recent fires in the Idaho Jarbidge BLM lands in 2010 illustrates the nonsense associated with replacing shrubs with grass. In fact, the same Jarbidge area that is 90 percent or more seeded perennial grass – burned again. In the course of around two days, nearly 300,000 acres burned in the recent Long Butte fire. Yet this area was in one of the Fuels condition classes that BLM fire personnel claim under the FRCC nonsense is able to limit and reduce fire. FRCC is in no way, shape or form a suitable basis for managing the beleaguered weed-vulnerable Winnemucca lands. Perhaps if you were writing an RMP for spruce-fir forests in Pacific Northwest. But it is nonsense for the Great Basin deserts.

Winnemucca BLM has conducted a whole series of haphazard and wasteful "fuels" projects that have destroyed big sagebrush with mowing, hacking, and herbiciding. In place of shrubs BLM is planting grasses that serve to extend the fire season, and burn contribute to landscapes burning in a flash. The very grasses that BLM is planting and especially the highly unpalatable crested wheatgrass and over-sized cultivar grasses that re NOT native ecotypes – have now been shown in the Jarbidge to do nothing to stop fires. In fact, these grasses allow whole landscapes to burn – literally in a flash. Areas without shrubs - including fuelbreaks that are grass –dry out earlier, and thus the fire season is prolonged. Grazing disturbance, which is ubiquitous on nearly all

Responses

NGO-WWW-16: BLM complies with the Healthy Forest Restoration Act of 2003. BLM uses FRCC as one tool with respect to fuels management. BLM collaborates with federal, state and tribal agencies in an effort to construct strategically placed fuelbreaks in an effort to protect wildland urban interface areas, and thousands of acres of critical wildlife habitat, including habitat for LCT, Sage-grouse, pygmy rabbit, and provide for public and fire fighter safety. The fuelbreaks are intended to stop or slow the spread of wildfires. In many instances fuelbreaks are constructed using mosaic patters keeping portions of the shrub component in place. BLM strives to use existing disturbed areas for placement of fuelbreaks. BLM combines habitat restoration with many of these fuels projects. Section VR4 provides a range of alternatives that include improving conditions classes of vegetation from Class 3, high departure to Class 2 to moderate departure. In addition fuelbreaks are maintained and monitored to ensure they remain effective to change fire behavior.

NGO-WWP-17: Cumulative effects were analyzed by section in Chapter 4. Fire history information was updated and is provided in Chapter 3 – Table 3-19. The cumulative impact analysis has been updated in the FEIS/RMP.

BLM complies with the Healthy Forest Restoration Act of 2003. BLM uses FRCC as one tool with respect to fuels management. BLM collaborates with federal, state and tribal agencies in an effort to construct strategically placed fuelbreaks in an effort to protect wildland urban interface areas, and thousands of acres of critical wildlife habitat, including habitat for LCT, Sage-grouse, pygmy rabbit, and provide for public and fire fighter safety. The fuelbreaks are intended to stop or slow the spread of wildfires. In many instances fuelbreaks are constructed using mosaic patters keeping portions of the shrub component on place. BLM strives to use existing disturbed areas for placement of fuelbreaks. BLM combines unburned habitat restoration with many of these fuels projects. Section VR4 provides a range of alternatives that include improving conditions classes of vegetation from Class 3, high departure to Class 2 to moderate departure. In addition fuelbreaks are maintained and monitored to ensure they remain effective to change fire behavior.

NGO-WWP

Comments

BLM lands, promotes trampling of the interspaces – so the volatile mix of large grass, overstocking and excessive trampling based on BLM monitoring livestock use (or lack of use) on

The full present and foreseeable scale of loss of these communities in adjacent lands – including Surprise FO - must be fully examined to understand how much loss of these targeted native communities may be occurring.

Instead of "restoring" habitat, such projects seem more aimed at wiping out species like Sage Grouse and Pygmy Rabbit, through extensive removal and fragmentation of essential habitat components. In the absence of these imperiled species, industry may have unfettered development access.

NGO-WWP-18

It is impossible to understand why the word "improve" is used in relation to FRCC. FRCC 3 is mature or old growth native communities, the precise communities that are increasingly rare and scarce, along with the biota dependent on them. FRCC 2 is not. FRCC is pretty much bare dirt and a little grass.

NGO-WWP-19

No valid Baseline has been provided of how much annual grassland, presence of cheatgrass, halogeton, crested wheatgrass, etc. exists, or sites vulnerable to these weeds if the sites are disturbed in expensive Fuels or other projects.

NGO-WWP-20
Vegetation

Likewise, there is no basis for understanding why "restore" is used for purposeful disturbances that often destroy sagebrush and pave the way for weed invasion. BM must clearly identify precisely the lands targeted for any manipulation and after defining restoration, identify where and how this would occur. Why not use any available funds to target restoration of native vegetation components to weedlands and crested wheatgrass?

NGO-WWP-21

There is no reason that only one ACEC would exist under any alternative. Greatly expanded consideration of sagebrush (Sage Grouse, Pygmy Rabbit), Salt Desert Shrub and other ACECs must be developed as a Supplement to the DEIS.

NGO-WWP-22

There is no reason that disposing of two million acres of BLM lands would allow for "sustainable development", compliance with Conservation Plans for Sage Grouse and other sensitive species, and other critical values of the public lands.

NGO-WWP-23

There is no basis for use of the term restoration if BLM is planning on disturbance of native communities.

How can an action be a "resource benefit" under one Alternative, but not others?

NGO-WWP-25

This section is supposed to be summary, but many harmful provisions of this alternative related to resource values and important and sensitive species are not provided here.

There is no mention of livestock grazing here. Given the vast weedlands, and increasing adverse effects of climate change on top of the desertification processes caused by chronic grazing and

Responses

The FEIS/RMP has been updated to show the fuel treatment and Emergency Stabilization and Rehabilitation acreages.

NGO-WWP-18: The BLM is mandated to use FRCC according to the Healthy Forests Restoration Act of 2003. A description of FRCC 1 is "Moderate departure form the natural (historical) regime of vegetation characteristics; fuel composition; fire frequency, severity and pattern; and other associated disturbances."

NGO-WWP-19: Table 3-10 provides acres of each plant community / association in the district. Figure 3-9 shows how much "invasive grasslands" are in the district. Invasive grasslands are primarily cheatgrass. Figure 3-10 shows historical weed infestations in the district.

NGO-WWP-20: Land identified for restoration or manipulation occurs on a case-by-case basis after collaboration with other federal, state and tribal agencies. Separate NEPA and public involvement also occurs once projects are defined.

NGO-WWP-21: BLM considered ACECs in a range of alternatives. Alternative A current management reflects the Winnemucca District has only one ACEC designated. Alternative D recommends maintaining the existing ACEC and recommends the addition of 3 new ACECs. In addition various Alternatives in the RMP designate large areas as avoidance and exclusion areas. Avoidance Areas would limit certain discretionary actions while exclusion areas would prohibit certain discretionary actions.

NGO-WWP-22: The lands depicted in the DRMP as suitable for possible disposal. A proposed disposal must meet all of the criteria stated in the DRMP. No lands will be disposed of that have critical values.

NGO-WWP-23: Plantings are considered restoration.

NGO-WWP-25: Refer to C-VR 2.1 Option One and C-VR 2.1 Option 2, Alternatives B and D.

NGO-WWP

Comments

Responses

NGO-WWP-26

other disturbances, there is no assurance that what canny be interpreted as the status quo stocking, including many "paper cows" on permits, is part of this action. The EIS is greatly lacking in detailed information necessary to understand the current Baseline for livestock, and to develop alternatives and analyze outcomes of the various alternatives. For example, if continued stocking allocations occur at current levels, the long-term success of ANY restoration project is likely to be non-existent – and projects, though extremely expensive, be trampled and grazed to weeds.

NGO-WWP-26: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level. Restoration projects would be assessed at an implementation level decision, which would evaluate different treatments.

NGO-WWP-27

Detailed mapping and analysis of all existing range facilities – and the changes since the old LUPS – must be provided. Then, all the current science on the deleterious and adverse effects of these facilities must be provided. A series of alternatives aimed at removing and reducing the Footprint of facilities and livestock must be developed.

Actual use by livestock or all areas for all years available must be provided. A series of alternatives with average actual Use as the maximum grazing allocation Baseline must be developed.

There is no valid basis for allowing crosscountry travel on a large area of the FO under any alternative. Dust from grazing and OHV use factor into climate change processes and those impacts must be fully examined here. The arid vegetation communities here are greatly vulnerable to disturbance, and weed expansion including with climate change effects. Plus, playa surfaces disturbed by OH s contribute large amounts of dust to the area. All of this must be factored into any analysis of "sustainability" in developing an alternative, and the adverse effects of an alternative in any analysis. Map a few limited cheatgrass play areas by towns under this Alternative, and be done.

The link between livestock facilities and management and roading must also be examined – which roads and trails developed in relation to facilities? How can these be reduced minimized, and lands and habitats restored?

NGO-WWP-27: These comments are addressed at the implementation level planning, such as grazing permit renewals, final multiple use decisions and OHV travel management plan. All of which include separate public outreach and environmental analysis.

NGO-WWP-28

Please provide comparative info on dust from disturbed soil/microbiotic crust and playa surfaces – compared to undisturbed areas.

Alternative C Option 1.

NGO-WWP-28: BLM has complied with requirements of 40 CFR §1502.14 by including a reasonable range of alternatives.

NGO-WWP-29

This is supposed to develop management strategies to improve and protect ecosystem health. But isn't the BLM required to do this under all Alternatives – thus rendering the full throttle development and massive land disposal of Alternative B a non-starter as a viable alternative?

We will be sending additional comments as we continue through the Volumes of the RMP.

Also, we request a meeting to discuss a range of greatly expanded ACEC proposals.

NGO-WWP-29: BLM developed a range of alternatives. Alternative B has a more use intensive theme, Alternative C has a more conservation theme. Objectives and management actions related to protecting ecosystem health are included in varying degrees in all alternatives.

Sincerely,

Katie Fite
Western Watersheds Project
PO Box 2863
Boise, ID 83701
208-429-1679

NGO-WWP-Fite	Comments	Responses

Katie Fite <katie@westernwatersheds.org>

10/19/2010 12:36 PM

To "Robert_Edwards@blm.gov" <Robert_Edwards@blm.gov>
cc
Subject TNC Nachlinger Site Portfolio for Nevada

Hi Mr. Edwards,

I am following up on our RMP meeting discussion last week, and the summary written info of some concerns that I provided with this information.

NGO-WWP-1 The TNC early 2000s work in Nevada was the best Site Portfolio info that I have seen – much better than that for Idaho or Oregon. Here is the text. I will send the summary and map on a cd, since it is too large to email.

NGO-WWP-1 As we discussed, Nevada BLM is woefully short on botanical specialists – in fact there appear to be none in the entire agency – so this Site Portfolio remains the best available info, and it must be fully considered, and updated BLM studies of these areas must occur as part of a current inventory.

NGO-WWP-2 We ask that for EACH of the Portfolio Sites identified in whole or in part on Winnemucca lands, that full ACEC consideration be included as part of the RMP process.

NGO-WWP-1: Comment noted.

NGO-WWP-2: BLM is required under FLPMA under Title 2 Section 202 (C) (3) to give priority to the designation and protection of ACEC as part of the land use planning process. The BLM included a full range of ACEC nominations. No other nominations were made.

NGO-WWP-Fite

Comments

NGO-WWP-2 Cont-d.

We also ask that habitat values for rare animal species of current conservation concern –such as Sage Grouse and Pygmy Rabbit -be overlaid with this info, and an ACEC "look" be taken that includes both. In most instances, the Nachlinger et al. work was focused almost entirely on plants/intact vegetation communities. Understanding, inventorying and acting to protect these values from irreparable harm-especially in the woefully degraded landscape that comprises many areas of the Winnemucca District - is part of what is required for BLM to have current inventory of its lands as required by FLPMA in a land Use Plan context.

NGO-WWP-3

A SEIS (Supplemental EIS) is very likely going to be necessary to include a wealth of updated info and analysis for many components of this RMP effort.

I will provide more info with further RMP comments, but this is essential for BLM to conduct an RMP.

NGO-WWP-4

I am greatly concerned that this kind of very important and integral public lands and FLPMA-required info was in not into account in a RAC "consensus" process.

NGO-WWP-5

As I also mentioned during our meeting, I am very concerned that salt desert shrub and other important communities are being largely ignored – as well as current science related to microbiotic crusts and other ecological data and science.

Yet several of these valleys with remaining intact communities are in the crosshairs of new energy development – including geothermal activity which is increasingly highly intrusive and having a large Footprint.

I reviewed the "potential" crust mapping in a volume of the RMP, and it is just like we have seen in a series of Winnemucca grazing decisions – relies on a Model that woefully underestimates crust occurrence and completely fails to provide data on current conditions.

Since Winnemucca BLM and Nevada BLM as a whole does not have the staff engaged in this current science, much more work needs to be done to provide a current "hard look".

Katie Fite
Western Watersheds Project
PO Box 2863
Boise, ID 83701

SSSS FIS TNC GRblueprint_v2001a_TXT.pdf

Responses

NGO-WWP-3: The FEIS will be updated as appropriate.

NGO-WWP-4: Comment noted.

NGO-WWP-5: BLM has developed a range of alternatives. Refer to VR 8. Biotic crusts are addressed at action S-1.

The attachment document was reviewed and considered by BLM; however, it is not included in this Appendix. To view this document contact the Winnemucca District Office at 775-623-1500, or via e-mail at wfoweb@blm.gov.

NGO-WWP-Fite

Comments

Responses

Katie Fite
<katie@westernwatersheds.org>
10/24/2010 10:30 AM

To "Robert_Edwards@blm.gov" <Robert_Edwards@blm.gov>
cc
Subject WWP Scoping Comments Carried Forward as Comments on DEIS Deficiencies

Hi Mr. Edwards,

NGO-WWP-Fite-1

I am afraid the DEIS developed on the basis of a RAC "consensus" approach to produce alternatives that were then modified further by the now-departed/retired Mgr. Gail Givens greatly ignored legitimate written comments provided by Western Watersheds Project and others as Scoping in the EIS process.

I am again submitting WWP's Scoping Comments as part of WWP's comments on the Winnemucca RMP DEIS. So much of the necessary Baseline information, and actions needed to guide management of Winnemucca lands until 2030 or beyond, are woefully absent from the RMP DEIS and Alternatives.

Please feel free to contact me if you need any more information about these Scoping comments and how BLM has not integrated these concerns into alternatives, analysis, and NEPA's required "Hard Look".

NGO-WWP-Fite-2

As I have been reviewing the RMP DEIS, time and again it is clear that our concerns were swept under the rug in the deficient DEIS that would continue large-scale exploitation of the sagebrush, salt desert and other ecosystems that are undergoing ecological collapse under the very same management actions that would be carried forward nearly unaltered under the DEIS.

It s hard to believe that we submitted these comments in 2005, and since then climate change, weed expansions, plummeting Sage Grouse and Pygmy Rabbit populations and habitat loss, goldmine aquifer drawdown drying up springs, and other adverse effects have all risen to the forefront of scientific understanding and are being evidenced on the ground across Winnemucca lands.

Yet five years later, in the "consensus" DEIS, it is as if BLM is living in some rosy past of Manifest Destiny

NGO-WWP-Fite-1: BLM has complied with the CEQ Regulations 40 CFR §1503.4 "Response to Comments". BLM is responsible for assessing and considering comments in the preparation of the final environmental impact statement.

NGO-WWP-Fite-2: The DEIS offers a range of alternatives. Alternative C develops management strategies to preserve and protect ecosystems while providing for multiple use. FLPMA section 102 (7) requires BLM to manage public lands based on multiple use and sustained yield.

NGO-WWP-Fite

Comments

and a limitless frontier of exploitable where there is an endless frontier of "resources" to continue exploiting at high levels, with no consideration of the finite nature of water, native landscapes, untrammeled viewsheds, etc.

NGO-WWP-Fite-2

The RMP lacks concrete planning goals or objective to change direction or the downward trajectory of the public lands condition.

NGO-WWP-Fite-3

We know BLM will never select an alternative that eliminates all grazing – so why in the world weren't a reasonable range of alternatives to address systematic reductions and removal of grazing disturbance from "at risk" areas, or key habitats? Or so that legitimate ecological restoration can occur.

NGO-WWP-Fite-4

Why wasn't a science-based examination of the status of Sage Grouse and necessary conservation actions to sustain and enhance all sensitive and imperiled species habitats and populations considered and developed under ALL alternatives?

NGO-WWP-Fite-5

Why wasn't the importance of intact salt desert communities, and of microbiotic crusts in all communities fully integrated into this RMP – in ignoring these important areas, you are certainly sacrificing them to degradation and loss –including from rapidly expanding threats of geothermal and other energy developments.

NGO-WWP-Fite-6

I again stress that an SEIS must be developed based on current science and an up-to-date Baseline of the environment from which to derive reasonable alternatives.

Katie Fite
Biodiversity Director
Western Watersheds Project
PO Box 2863
Boise, ID 83701

208-429-1679 Winnemucca LUP Scoping.doc

Responses

NGO-WWP-Fite-2: Comment noted.

NGO-WWP-Fite-3: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level. Livestock grazing on BLM land is administered under the Taylor Grazing Act and is one of the multiple uses authorized by FLPMA. The RMP allows for a range of alternatives related to livestock grazing, including relinquishment of grazing permits and elimination of livestock grazing.

NGO-WWP-Fite-4: Refer to Chapter 3.
Science based studies of the status of sage grouse have been conducted by the USFWS and WAFWA that have been incorporated through reference in the RMP.

NGO-WWP-Fite-5: BLM has developed a range of alternatives refer to VR 8 and S 1.

NGO-WWP-Fite-6: The FEIS has been updated as appropriate.

NGO-WWP-Fite **Comments** **Responses**

April 12, 2005

Winnemucca BLM
Attn: Jeff Johnson
5100 East Winnemucca Blvd.
Winnemucca, NV 89445

Re: Winnemucca Land Use Plan EIS Scoping

Dear EIS Planner Johnson,

Here are Overview comments of Western Watersheds Project on Winnemucca BLM's Land Use Planning process that is currently underway. We may submit additional comments, ACEC proposals, and relevant literature citations as separate documents.

BLM'S Duty Under FLPMA

BLM is required under FLPMA to consider present and potential uses of the public lands, and the scarcity of values involved. The sagebrush sea, salt desert shrub, aspen pockets, mahogany thickets, playas, scarce streams, springs and seeps, clear air, and wild roadless lands of the Planing area are important examples of the wide-open country that once characterized the American West.

Recent scientific assessments conducted under the Interior Columbia Basin Ecosystem Management Project (ICBEMP) such as Wisdom et al. 2000 recognize the importance of protecting and enhancing native plant communities for the long-term persistence of sagebrush biota, as well as the grave threats of growing exotic species invasions that could ultimately doom these lands. (Wisdom 2000). These studies are now buttressed by a number of comprehensive new analyses (Knick et al. 2003, Connelly et al. 2004, Dobkin and Sauder 2004) thatlikwise highlight the need ot protect, enhance, and reconnect fragmented areas of sagebrush-steppe. The Winnemucca lands provide great opportunities for BLM to actually fulfill its duties under FLPMA, and act to stop further ecological harm from occurring to relatively intact landscapes; to undertake meaningful conservation actions to enhance and restore damaged or degraded sites within these lands (i. e. restore de-watered springs; control and obliterate unneeded roading that has grown up without authorization as livestock projects or activities have occurred, such as roads to salting sites); remove harmful livestock projects that may be fragmenting sage grouse or other habitats and may be serving as epicenters of weed invasion; and to restore composition, structure and function of sagebrush communities.

The Winnemucca lands contain scarce desert springs that are essential oases for a native animal species. Large areas have been recognized by The Nature Conservancy (TNC) as being of great

NGO-WWP-Fite

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importance to long-term conservation of Great Basin biota and ecosystems. See Nachlinger et al. 2001, "Great Basin: An Ecoregion-based Conservation Blueprint".

Given the acknowledged national significance of the lands in the vast ecosystem that spans state boundaries, and relatively intact salt desert shrub, and montane island communities, BLM can not undertake a typical BLM livestock-centered planning process. Accommodating public lands grazing can not be the primary force in this effort. BLM needs to make clear at the very beginning of the EIS process that there are a host of other important and significant public lands values in these lands, so that protection and enhancement of these values will drive the EIS effort and a range of reasonable alternatives, its land management decisions, and habitat enhancement or restoration actions.

The EIS must focus on management to protect intact landscapes of sagebrush plateaus and uplands, canyonlands, sweeping basins and forested ranges, and to provide unfragmented core habitat for sage grouse, raptors sagebrush-obligate migratory birds, pygmy rabbit, and other sagebrush obligates such as pronghorn. BLM must also protect rare and endemic plant and animal communities, cultural sites, and other important sites.

BLM must recognize the current and potential value of portions of these lands as reference sites in scientific research, and as minimally fragmented ecosystems for species restoration and long-term population viability. In the increasingly developed US, the value of such lands as an enclave of solitude and open space is great.

While recognizing, protecting, and enhancing special status species habitats and other important values, BLM must also grapple with ongoing livestock grazing degradation of riparian areas and uplands in portions of these allotments; invasive species (primarily caused or extended by livestock disturbance, facilities and/or roading); fragmentation caused by grazing installations/livestock facilities, fire and other factors; OHV use exacerbated by livestock facility-associated roading; and other impacts of livestock grazing that are increasingly fragmenting sagebrush habitats.

Designation of ACECs of sufficient size to truly protect functioning ecosystems is very important to protect special values of these landscapes. It is imperative that BLM in this planning process acts to protect these irreplaceable values and attributes. Recreational uses of public lands are burgeoning as populations in the Intermountain West grow.

Subdivision or other development of checkerboard land threatens future fragmentation of sagebrush and salt desert shrub communities.

The diminishment, degradation and often disappearance of springs and other surface waters in Nevada is a serious and expanding threat to the persistence of native biota. Many springs have been developed, thus killing or much-reducing surface flows. Plus, the threat of water export and ground water depletion affecting regional aquifers is looming over eastern Nevada due to plans to construct pipelines and export water to Las Vegas or other areas - such as Wendover. In the

NGO-WWP-Fite

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Winnemucca lands, development of coal-fires power plants and other human uses threatens surface water and aquifer depletion.

Importance of Collecting Baseline Data for Developing Alternatives and Analyzing Outcomes

NGO-WWP-1

BLM must collect adequate baseline biological data on wildlife habitats and populations and vegetation and other ecological conditions in the EIS lands. This will require a minimum of two years of intensive effort, and must include new on-the-ground inventories for special status species and analysis of habitat conditions for these species. This information must be thoroughly and systematically collected, as it will be used in developing the EIS that will govern management here for the next decade or longer.

Good Maps

NGO-WWP-2

Maps are not only important in the EIS, but for users of the document in future years to understand management constraints - or goals - on specific land areas when agency projects are proposed, and when new threats arise. Maps need to be detailed, and provide ready geographic frames of reference so that a reader can more easily orient themselves on landmarks such as drainages, and understand locations. A blank grid of sections is not sufficient. With the GIS capabilities available today, BLM can overlay values or threats such as cheatgrass domination of understories, old seedings, understories lacking forbs, areas that have undergone or are threatened by wind or water-caused erosion, relatively intact native vegetation communities, etc. and produce maps that clearly show important lands, threats, etc. Following the very disappointing statements about lack of mapping information made by BLM at the public meeting,

Grazing Suitability, Carrying Capacity, Productivity and Other Analyses

NGO-WWP-3

BLM is required under the Taylor Grazing Act to set forth its criteria and assessments for grazing suitability determinations. The TGA was passed to "stop injury to the public lands by preventing overgrazing and soil deterioration", and to determine that land is "chiefly valuable" for grazing. FLPMA requires that BLM undertake an exhaustive and continuous inventory of the public lands and use this inventory to develop land use plans. The EIS process is an opportunity to conduct this analysis. NEPA requires that an agency provide a "full and fair discussion" of significant environmental impacts, take a "hard look" at the environment and impacts of various alternatives, and that statements shall be supported by evidence that the agency has made the necessary environmental analyses. NEPA also requires the use of sound science.

BLM must provide a two-part grazing suitability analysis that:

1) Catalogues and describes lands unsuitable for grazing due to lack of herbaceous vegetation "production"; distance from natural water sources; slope, rockiness (much of these allotments); existing environmental damage (downcut gullies, wet meadows with shrinking wetted areas due to livestock damage, lands "at risk" to weed invasion); lands

Responses

NGO-WWP-1: FLPMA Sec. 202(c)(4)gives the BLM the discretion to rely to the extent it is available, on inventory of the public lands, their recourses and other values.

BLM is required under NEPA to provide information in NEPA documents that must be of high quality, possess accurate scientific analysis, and is subject to public scrutiny before decisions are made or actions are taken (40 CFR 1500.1.(b)). On the other hand, the purpose of NEPA is not to collect massive amounts of data but to provide data that is high quality and accurate in order to conduct a detailed analysis of issues that are truly significant to the action in question and reach an informed decision. The BLM has used available data, information based on professional evaluations and observations and applicable reference materials to support the NEPA analysis. The FEIS includes updated information, revised tables, and figures.

NGO-WWP-2: The BLM has produced maps or figures sufficient for the development of the RMP.

NGO-WWP-3: BLM has complied with the FLPMA, the Taylor Grazing Act, NEPA, and other applicable laws and regulations, in the development of this RMP. Original livestock grazing allocations were established upon the passage of the Taylor Grazing Act. Suitability was addressed in the 1982 MFPs . LG 1.3 identifies lands designated and not designated for grazing.

NGO-WWP-Fite

Comments

so seriously depleted that they are no longer able to support livestock grazing on a sustainable basis; and lands that are "at risk" of crossing thresholds (due to livestock degradation) from which recovery to native vegetation communities will not be possible due to dominance of exotic species.

2) Catalogues and describes lands unsuitable for grazing based on their important values to rare and declining species, recreational uses, cultural sites, aesthetic value, and other legitimate uses and values of public lands that are harmed or degraded by the chronic effects of livestock grazing.

We are unaware of any such past science-based suitability analyses that have been conducted in Winnemucca lands. If they exist, please provide them for public review as part of this process, and use best available science, and collect on-the-ground information necessary to up-date them. Old adjudication claims can in no way be considered "current", nor can they reflect current scientific knowledge of suitability of many of these lands for livestock grazing in the face of dire threats posed by weed invasions and habitat loss.

In reality, the old "adjudication" process grossly over-estimated the suitability, capability and production of the affected lands. Gross exaggerations in lands made in adjudication processes were largely carried forward in the outdated land use plans. Given the ongoing depletion, loss and desertification of many areas, with only scant *Poa* or Squirreltail, or cheatgrass dominance as primary "forage", loss of large-sized native bunchgrasses, etc.), and weed invasions resulting in wildly fluctuating and unreliable annual forage production, current suitability and other assessments are urgently needed.

NGO-WWP-4

BLM must abandon the mindset that endless forage exists to support the grossly inflated permitted AUMs, and stop carving up the landscape with new livestock projects that will harm refugia of better condition habitats for native species in an attempt to support these unsustainable numbers of cattle and sheep. A key part of this is determining unsuitable lands and cutting AUMs accordingly, as well as determining facilities of projects that are harming important habitats, and scheduling their removal.

The new assessment/inventory of acres of lands suitable and unsuitable for livestock grazing, and capable and not capable, must be based on scientifically accurate criteria, be comprehensive, and include collection of on-the-ground data on condition and health of soils, microbiotic crusts, native vegetation (quality, quantity, production), habitat values and quality, and effects of depletion or fragmentation on special status species, the relative scarcity of values, etc.

Examples:
- Across large areas, greatly depleted Wyoming big sagebrush and salt desert shrub communities require 20 acres or more to support a single AUM. Plus, these lands are increasingly being invaded by halogeton and other weeds as livestock further deplete and trample vegetation and soils. Yet grazing that one AUM across dozens of acres differentially impacts the remnant native grasses (*Oryzopsis, Stipa, Agropyron*), weakens or kills winterfat and other shrubs, tramples soils creating ideal conditions for weed establishment, removes plant

Responses

NGO-WWP-4: LG 1.3.1 addresses adjustments to forage allocations. Specific allotment AUM allocations are addressed at the site specific or allotment level.